



States of Jersey

Freedom of Information

Records Management Gap Analysis

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CONTENTS

1	INTRODUCTION	4
1.1	Defining Records Management	4
1.2	Background	4
1.3	This Report	5
2	EXECUTIVE SUMMARY	6
3	IDEAL REQUIREMENT	10
3.1	Introduction	10
3.2	The Requirement	10
4	ASSESSMENT	17
4.1	Records Management Strategy	17
4.2	Sponsorship	17
4.3	Delivery Programme, Records Management Plans	17
4.4	Records System Standard	19
4.5	Records Retention Periods Standard	20
4.6	Records Classification Standard	20
4.7	Information Security Standard	21
4.8	Business Continuity Standard	21
4.9	Offsite Storage Facility	22
4.10	Corporate EDRM Platform	22
4.11	Information Management Policy	27
4.12	Records Management Policy and Procedure	27
4.13	Information Access Policy and Procedure	28
4.14	Records Management Programme Board	28
4.15	Records Management Plan Owners	29
4.16	Records Management Practitioners	29
4.17	Scrutiny and Challenge Panel	29
4.18	Information / Records Management Team	30
4.19	Communications Campaign	31
4.20	Training Programme	32
4.21	Summary of Costs	32
4.22	Order and Flow of Action	36
4.23	Records Management Roles and Responsibilities Diagram	37

1 INTRODUCTION

1.1 Defining Records Management

- 1.1.1 This report adopts the definition within the ISO 15489-1 international standard 'Information and documentation — Records management — Part 1:General', whereby Records Management is the:

"field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records"

- 1.1.2 This report adopts the definition of a Record from the Public Records (Jersey) Law 2002, whereby a record is:

"information that (a) is created or received...in the conduct of a corporate, institutional or individual activity; and (b) has such content, context and structure as to provide evidence of the activity...a record may be in any code or language, and in any medium"

- 1.1.3 In summary, Records Management is about a systematic approach of people, process and technology, managing all evidential information throughout its entire lifecycle.

1.2 Background

- 1.2.1 The States of Jersey has drafted a new Freedom of Information (Jersey) Law 201-, which, if enacted, will replace the existing Code of Practice on Public Access to Official Information. This will effectively remove the standard 30 year closure of records that is currently in place and replace it with the assumption that all public records are open to public access from the day they are created.

- 1.2.2 International good practice closely aligns Freedom of Information with Records Management. To quote from the Lord Chancellor's Code of Practice on the management of records issued under section 46 of the Freedom of Information Act 2000 (Ministry of Justice and The National Archives):

"Freedom of information legislation is only as good as the quality of the records and other information to which it provides access. Access rights are of limited value if information cannot be found when requested or, when found, cannot be relied upon as authoritative. Good records and information management benefits those requesting information because it provides some assurance that the information provided will be complete and reliable. It benefits those holding the requested information because it enables them to locate and retrieve it easily within the statutory timescales or to explain why it is not held."

- 1.2.3 Records management principles also underpin the existing Public Records (Jersey) Law and the Data Protection Law.
- 1.2.4 The Historical Abuse Inquiry showed the vital importance of the use of records as evidence.

- 1.2.5 There are also of course wider benefits in terms of efficiency gains, effective estates management, supporting flexible working, improved customer service and better risk management in a range of areas.
- 1.2.6 As part of their deliberations prior to any enactment, the States has commissioned Socitm Consulting to undertake a gap analysis of their records management practices, together with a costed action plan for improvement.

1.3 This Report

- 1.3.1 Based on the discussions within and findings from a series of meetings and workshops conducted in St. Helier during 23rd to 26th August 2010, we have created this report as a gap analysis on the practice of Records Management within the States.
- 1.3.2 It is important to note that this is not a gap analysis of the performance of the related historic archiving and preservation function of the Jersey Archives Services provided by the Jersey Heritage Trust.
- 1.3.3 We have assessed Records Management at the States as to it being an effective management system for the management of information (both physical and digital) from planning and creation until ultimate disposal or preservation. This is based upon an 'Ideal Requirement' of what is required and why.
- 1.3.4 This requirement is based upon the insight of Socitm Consulting together with recognised industry good practice. It is also informed by the UK *Lord Chancellor's Code of Practice on the management of records issued under section 46 of the Freedom of Information Act 2000*. These requirements have been 'tested' for their applicability at the States during the discussions held in St. Helier.
- 1.3.5 For each individual aspect of the requirement (i.e. those underlined within section 3.2 below), we have made an assessment of the current status and actions to improve.
- 1.3.6 This report also provides an indicative cost to deliver those actions.

2 EXECUTIVE SUMMARY

- 2.1.1 The creation of an effective and sustainable management system for Records Management is fundamental to ensuring the successful handling of information access requests under Freedom of Information legislation.
- 2.1.2 It ensures that the evidential records of the States' decisions, activities, transactions and performance are kept, that they remain accessible and can be quickly and easily found, that when found they can be trusted, and that when disposed of they are done under the auspices of policy with audit trails maintained.
- 2.1.3 Whilst only 12 recorded Information Access requests were received under the current Code last year, all records will now be open, records prior to 2000 can be requested and FOI will ultimately have the strength of law. There are also a lot of current media enquiries that will become FOI requests. FOI will be marketed, so it will be tested!
- 2.1.4 However, the importance of Records Management, and the sub-theme of increased electronic working, will deliver important benefits to the States. It can help:
- Remove wastage in the States' accommodation
 - Remove barriers to modern, more flexible ways of working
 - Improve customer service when handling customer enquiries and requests for service
 - Improve service efficiency and quality, increasing productivity and constraining headcount
 - Reduce the operational costs of information management
 - Mitigate the various legal and operational risks associated with information management
- 2.1.5 Our key recommendation is to put in place a model that combines centralised policies and guidance sufficient to protect the interests of the States, with decentralised implementation to enable a flexible and pragmatic response to business needs. The enactment of this would be the Department-level production, implementation and maintenance of a Records Management Plan. This would be based upon approved corporate standards for retention, classification, security, business continuity and the use of records systems.
- 2.1.6 This process will be managed under a dedicated Records Management Programme that will require sponsorship, governance, dedicated functional responsibility, policy, procedures, communication and training.
- 2.1.7 Increased electronic working will be facilitated via the implementation of a standard, corporate platform (based on Open Text Livelink) for Electronic Document and Records Management (EDRM).
- 2.1.8 Physical storage will be supported by the provision of a dedicated offsite facility for semi-active records to complement the Jersey Archives.

- 2.1.9 There will be substantial costs - these can be put into five areas of expenditure:
- Staffing the dedicated Information & Records Management Team (comprising an Information Manager, a States' Records Manager, an additional Records Manager at the Jersey Trust and two FOI Practitioners)
 - Funding the release of the departmental Records Management Practitioners, providing alternate resource to cover other aspects of their work whilst these officers are dedicated to the Records Management Programme
 - Providing an offsite Storage Facility for semi-active physical records
 - Investing in the software and services to make Open Text's Livelink the corporate platform for EDRM
 - Providing tools and materials to support the Communications Campaign and Training Programme
- 2.1.10 Based on the calculation within section 4.21 below, this could require an initial investment of £4,263,000.00, with a recurring annual cost of £1,028,380.00.
- 2.1.11 However, there will also be substantial returns on investment, over time, particularly in reducing the reliance on paper processes, derived from the States operating more efficiently and effectively. Areas of likely return are summarised below.
- 2.1.12 **Accommodation:** The offsite storage of inactive paper records and the increased use of electronic working via EDRM and related technologies, will remove wastage in the States' accommodation, ensuring that the States can utilise its premium office space in the most space and desk-efficient manner, facilitating any opportunity for moves, restacks and other changes, without being hindered by the volume of or need for proximity to paper filing. The UK e-Government Project Nomad showed that flexible, more electronic working could increase occupancy by 35%.
- 2.1.13 Support can be provided to the current plan to rationalise the accommodation estate. Money can be saved on leases and revenue raised from property sale or let. Also money can be saved in supporting people in office environments, including furnishings, catering facilities, heat and lighting, security and insurance, office equipment.
- 2.1.14 **Productivity:** Experience and industry surveys show that staff time will be saved in the tasks of creating, filing, data entry, finding, and re-filing paper documents; also in reproducing lost and misfiled documents. One additional employee is required to maintain every 12 filing cabinets (PWC/Fujitsu). This equates to Equates to £1,500 p.a. per cabinet (Office of National Statistics average general office worker salary of £18K), at a cost of £8,500 per annum to provide accommodation for each employee (National Audit Office).
- 2.1.15 Recent research by EDRM provider IDOX is that for every 3 FTEs required to manage a paper filing system, only one is required to manage EDRM. Microsoft has estimated that staff typically spend 7.5% of PC time spent just looking for information. Various studies show that it is possible to improve service productivity by at least 20%. Norwich City Council made 18% staff (agency worker) savings via EDRM (Civica).

2.1.16 Cost of Discovery: Improving the organisation of filing generally and the use of EDRM specifically can facilitate the handling of information access requests, which is otherwise laborious and expensive, with the recovery of the costs associated with it being almost unachievable. Having to search for documents in response to legal demand could lead to costly penalties if a document is lost or missing and the successful outcome of cases can be jeopardised; it is hoped that EDRM will mitigate this.

2.1.17 Office Expenses: The expense of paper itself, photocopying, printing and postage can be reduced if paper documents are captured and circulated electronically. The expense of filing equipment (cabinets, folders) can be substantially reduced if documents are retained electronically. The expense of having to return telephone calls after information is located can be reduced if business records are available on-line at the time an enquiry is received.

2.1.18 Staff Sickness and Retention: Working life can be made 'easier better'. Staff dissatisfaction with laborious working processes is mitigated. Increased staff morale can be achieved due to greater self-control and fulfilment over self-service to information and the subsequent increased efficiency and enhanced customer service. There is also less blame and dissention when looking for lost information. The introduction of modern ways of working, with a leaner, cleaner and more electronic environment, has shown that staff sickness rates can be reduced by 60% (UK e-Government Project Nomad on flexible working). Staff agency costs to cover can be reduced. There are also reductions in recruitment and training costs (at least £2,000 per person, considerably more for roles such as social workers) if more staff are retained via flexible working.

2.1.19 ICT and Storage Costs: Also there can be savings made on reducing the support spend on multiple systems and reducing the external spend on offsite storage for physical records (for example, Planning spend £55K per annum and Social Security spend approx. £25K per annum with G4S).

2.1.20 In summary, there are a range of cost saving that can be achieved:

- Rationalise office accommodation
- Save money on office leases
- Generate external revenue from accommodation sale or let
- Constrain headcount, over time particularly in the use of less agency staff and with a reduction in manual processes requiring more staff resource than electronic working
- Improve staff retention
- Reduce recruitment costs by 30%
- Reduce staff training costs
- Reduce photocopying costs by 25%
- Reduce printing volumes by 25%
- Reduce paper costs by 25%
- Reduce postage costs by 25%

- Reduce telephone calls by 30%
- Remove need to procure new filing cabinets
- Reduce costs of files / folders by 50%
- Reduce (archive) file transport costs by 50%

2.1.21 If the States accept the fundamental strategic importance of Records Management then the investment will be worthwhile and see relatively quick returns.

3 IDEAL REQUIREMENT

3.1 Introduction

- 3.1.1 This section identifies the ideal requirement, the “things” that need to be in place for Records Management and why.
- 3.1.2 This requirement is based upon the insight of Socitm Consulting together with recognised industry good practice. It is also informed by the UK *Lord Chancellor’s Code of Practice on the management of records issued under section 46 of the Freedom of Information Act 2000*. These requirements have been ‘tested’ for their applicability at the States during the discussion held in St. Helier during 23rd to 26th August 2010.

3.2 The Requirement

- 3.2.1 Good Records Management (ensuring that the right information is retained and available for as long as is needed) is fundamental to open and transparent government, particularly if Freedom of Information is enacted. Therefore the States needs a corporate Records Management Strategy for creating and embedding a suitable management system. This must establish the aims and objectives, and have an associated delivery plan, with clearly identified actions, responsibilities and timescales.
- 3.2.2 A Director-level Sponsor should be in place for Records Management to give leadership, direction and authority.
- 3.2.3 The strategy would have a Delivery Programme. Fundamental to this is an approach that combines centralised policies and guidance sufficient to protect the interests of the States, with decentralised implementation to enable a flexible and pragmatic response to business needs. The enactment of this would be the Department-level production, implementation and maintenance of a Records Management Plan.
- 3.2.4 The Records Management Plan will be a fundamentally important artefact. Essentially these Plans are a departmental statement of the business purpose, scope and origin of the States' records, containing details of:
- What records actually need to be kept for business, regulatory, legal, accountability and history purposes
 - How and by whom records have been created and captured
 - Where records are located
 - How long they are to be retained
 - The records systems to be used
 - Who is responsible for the management of records
- 3.2.5 This would be based upon approved corporate standards for retention, classification, security, business continuity and the use of records systems.

- 3.2.6 In effect, within the Records Management Plan, each department would create an information asset register, based on an information audit, which catalogues and describes the main file series / digital collections and important individual documents and other items that the States holds, aligning them to retention periods. This process will also support space planning, security and business continuity risk management and other initiatives.
- 3.2.7 The outcome of this process would also produce, as part of each plan, a publication scheme that identifies (based upon UK Information Commissioner's Office guidelines):
- Who we are and what we do
 - What we spend and how we spend it
 - What our priorities are and how we are doing
 - How we make decisions
 - Our policies and procedures
 - Lists and registers
 - The services we offer
- 3.2.8 As indicated above, a number of corporate standards need to be in place for Records Management. Perhaps the most important of these is the Records System Standard.
- 3.2.9 All evidential records should be stored in corporate record-keeping 'systems', both physical and digital, that ensure their ready availability, whilst protecting their confidentiality, authenticity and integrity. At the same time they should be cost-effective to operate, particularly in supporting the agenda for best use of physical and digital space, as well as considerations of software licence and professional service costs.
- 3.2.10 Storage approaches, embodied within the Records System Standard, should ensure that:
- There are logical filing structures supporting retrieval and disposal arrangements
 - Systems are based on standards for referencing, naming and version control
 - Protection from fire, flood and environmental damage
 - Protection from accidental or unauthorised alteration, copying, movement or deletion
 - Protection from digital obsolescence and physical deterioration
 - Accepted standards for health and safety are followed
 - Audit trails are maintained to accurately log when records are created, accessed or disposed of
 - Movements of physical records are tracked and arrangements are made for the storage of semi-active filing

- There is cross-referencing of electronic records to their paper counterparts (where dual systems are maintained)

- 3.2.11 A corporate Records Retention Periods Standard would set out the baseline retention statements (the length of time, the triggering event for this period to commence and the relevant business / legal citations) that would be used when departments create retention schedules within the information asset registers of their Records Management Plans. These would be the default periods for the primary business functions of the States or its contractors / partners holding records on its behalf. Exceptions would then be applied as required on a local basis. This standard also provides an artefact to monitor legal citations and support reaction to any changes in the legislative environment.
- 3.2.12 A corporate Records Classification Standard would establish the core classification scheme (or hierarchical file plan) to be implemented within records systems, particularly electronic. This might be within electronic document management systems, NTFS network file stores etc. It would provide the higher levels of any filing scheme on a consistent basis, for users to evolve below based on actual business activity. It should be based on the recognised "F.A.T." principle of Function, Activities and Transactions; the functions of an organisation tend to change less over time than organisational structures and ensure a sustainable filing approach that remains meaningful for interrogation in the future. The standard would also include corporate Metadata standards for people, property, places, transaction types etc., to ensure consistent use of identifiers and controlled vocabularies. Again this will facilitate retrieval over time.
- 3.2.13 A corporate Information Security Standard for records, based on approved information security policies and protocols, would establish the storage (access control and protective marking), transmission and disposal arrangements to be put in place for records dependent upon their security classification.
- 3.2.14 A corporate Business Continuity Standard for records would establish the storage and recovery arrangements to be in place for records dependent upon their criticality classification, particularly to ensure the protection of "vital" records.
- 3.2.15 In implementing the Records Management Plans, staff will need to be supported with facilities that make the physical and electronic filing and retrieval process efficient and effective.
- 3.2.16 For physical filing, this includes the provision of Offsite Storage facilities for semi-active records that are no longer required for active day-to-day use, yet which are still within their retention period and therefore not eligible for destruction or transfer to the Jersey Archive. Records would not remain in premium office space or be stored in unsuitable accommodation. Ideally access to this facility should be established on a corporate basis to make sure that there is best contractual value and there are systematic processes in place for logging and tracking files / boxes. Re-charges could then be made to user departments. The establishment of this facility would be supported by provision of archive boxes and file management software.
- 3.2.17 For electronic filing, this includes the provision of a standard software toolset for Electronic Document and Records Management (EDRM).

- 3.2.18 Increased electronic working (over time) supports the accommodation strategy, the availability of the right version of the right document at the time and place of need, the online publication of information, the automation of business process and business continuity arrangements. A single corporate system for EDRM lowers cost of ownership and facilitates adoption and training. It means that processes and policies can be implemented on a consistent basis. It supports the realisation of the single view (of an activity, person, property, place, asset etc.) in order to support the response to information access requests and general business / case planning. An EDRM system will also manage the whole record lifecycle from creation to disposal in a seamless and controlled manner. The managed disposal of electronic records will also alleviate acknowledged data storage pressures at the States.
- 3.2.19 Where there is a need that is not already met for electronic document management, this corporate platform is readily available for deployment, providing capabilities as required in the following areas.
- Scanning and image processing
 - Active document management (including revision control and collaboration)
 - Workflow management and business process automation
 - Systems integration (based on Service Oriented Architecture standards)
 - Archival filing and retention / disposal management
 - Audit trails and management reporting
- 3.2.20 Over time this system will evolve into the corporate electronic records store, with protected and policy-managed storage of all evidential documents.
- 3.2.21 We must recognise the need to accommodate 'best fit' solutions that might provide the specialist functionality required to support a particular business process and/or the recognition that data conversion to a corporate platform is a costly project. The corporate EDRM system can though provide a Records Management 'hub' for information assets managed in other systems (be these document management, back office or CRM Systems), with record sets declared to the hub at suitable evidence points, applying retention policy on a consistent basis.
- 3.2.22 Consistent policies, procedures and guidelines (including clear statements relating to the roles and responsibilities expected of staff and contractors) need to be produced for every aspect of paper and digital records lifecycles from planning to ultimate disposition. Given the intrinsic relationship of Information and Records Management, an umbrella Information Management Policy is required, under which there are more specific protocols for both Records Management and Information Access (FOI), as well as other related policy areas such as Information Security and Data Quality.
- 3.2.23 Fundamentally this would address the principles of:
- Identification
 - Ownership
 - Openness

- Support for business processes
- Reliability
- Whole lifecycle approach
- Retention
- Protection
- Compliance
- Systems strategy
- Monitoring

3.2.24 Records Management Policy and Procedure would reinforce the approach and set out the responsibilities of officers with specific records management roles and the duties of Directors to apply records management policies, standards and guidelines, and authorise disposal, as well as all staff in keeping accurate and complete records of their activities.

3.2.25 It would cover areas such as:

- Record creation guidelines
- Referencing and classification
- Specific guidelines of the filing, storage and tracking of physical records
- Specific guidelines on the filing and storage of electronic records, including scanning and evidential weight considerations
- Retention and disposal
- Preservation of historic records

3.2.26 Based on an agreed process for handling information requests under Freedom of Information law, Information Access Policy and Procedure would set out:

- Principles of general rights to access
- Maintenance of publication schemes (within the Records Management Plans)
- Exemptions and their handling
- Process and responsibility for processing Freedom of Information Act requests and ensuring the Act is complied to within legal timescales
- Handling of complaints
- Use of case management system – recording decisions
- Handling of records held externally / by contractors

3.2.27 It would need to be aligned to protocols for Data Protection.

3.2.28 Governance structures must be in place to ensure that there is leadership, direction, accountability, implementation, reporting and monitoring of the Records Management programme. A delivery mechanism, led by a Records Management Programme Board, needs to be in place. The Programme Board would direct and control the establishment and maintenance of the programme, based primarily upon the deployment of the Records Management Plans.

- 3.2.29 Chaired by the Sponsor, such a Board would typically include dedicated functional personnel (i.e. corporate Records Managers / Archivists), representatives from Legal and Internal Audit functions, plus the nominated Plan Owners of the Records Management Plans. The Plan Owners will be senior business managers having the authority, the commitment and the resources to help establish and maintain the States' RM Programme.
- 3.2.30 Programme management would be performed by a corporate Information / Records Management professional.
- 3.2.31 Local delivery would be managed by designated departmental-level Records Management Practitioners, who would have a key project management role in the practical creation and implementation of the Records Management Plans.
- 3.2.32 There should also be a Scrutiny and Challenge Panel external to the Programme Board.
- 3.2.33 Thus, if Records Management is to become a systematic management discipline within the States, it requires dedicated corporate personnel who have specific functional responsibility, providing domain expertise, dedicated operational resource and responsibility for programme management. This means putting in place an Information / Records Management Team.
- 3.2.34 Fundamentally one or more professionals should be in place to:
- Manage the Records Management programme
 - Lead the development of corporate policies and procedures
 - Design standards for records systems
 - Develop communication and training plans
 - Manage the storage strategy for active / semi-active physical records
 - Generally liaise with the business and ICT
 - Monitor industry, legislative and technology developments
- 3.2.35 There would also be dedicated Information Access professionals to provide guidance, support, compliance monitoring and lead on managing cultural change with relation to Freedom of Information processes.
- 3.2.36 For Records Management to be successful there will need to be a process of cultural change. The corporate commitment to Records Management must be communicated clearly, via an ongoing, multi-media Communications Campaign, reinforcing the objectives and beneficial outcomes, the policy principles, the processes to be followed, the resources available, the ongoing decisions and wins.

3.2.37 It is particularly important that Records Management should be seen as being 'part of the day job', with the principles of record keeping embedded in the HR lifecycle, from job specification, through induction, to evaluation and any exit interview. It is essential that a thorough Training Programme for Records Management is established based on a comprehensive needs assessment to deliver the programme and the incorporation of a competency framework for information management. Particularly there should be formal professional development for staff with functional responsibility for Records Management.

4 ASSESSMENT

4.1 Records Management Strategy

- 4.1.1 A statutory commitment to aspects of Records Management is embodied within the Public Records Law (Jersey) 2002, whereby Jersey Heritage, the archivist and each public institution have specific duties in relation to Records Management and the correct disposal of records. Primarily this requirement focuses on the appraisal and transfer of public records to the Jersey Archive and the production of and compliance with retention schedules for each institution to identify which records should be transferred or confidentially destroyed after a given period of time. However, there is no formal strategy (document) or programme for Records Management within the States.
- 4.1.2 **Our recommendation** is that a formal strategy for Records Management is created and approved, led by the new Information Manager and given authority by the Sponsor. This would create a Records Management programme that brings together responsibilities for records in all formats, including electronic records, throughout their lifecycle, from planning and creation through to ultimate disposal, based on the concept of the Records Management Plans.
- 4.1.3 There is no direct cost in undertaking this action, although the efforts of those holding specific Records Management roles will need to be accounted for. Please refer to section 4.21 below.

4.2 Sponsorship

- 4.2.1 There is no director-level lead / sponsor for Records Management within the States.
- 4.2.2 **Our recommendation** is that a Sponsor is appointed to lead the development of the Records Management Strategy and chair the Board for the implementation Programme. This Sponsor should ideally be at the level of Deputy Chief Executive (e.g. of Resources).
- 4.2.3 There is no direct cost in undertaking this action.

4.3 Delivery Programme, Records Management Plans

- 4.3.1 There is a programme of work for some aspects of Records Management in place, particularly focusing on the development of retention schedules. This work could form the basis of onward engagement around the Records Management Plans.

- 4.3.2 Since 2007 the Archivist has been working with the 26 Departments and has produced and gained agreement to retention schedules with 12 of the departments; prior to this none were identified as being in place. These identify the retention rules for each file / document type (or 'record series'), ideally mirroring the filing system for each Department. The schedule details how long the records should be kept by each Department, the review date of the records and guidance on 'disposition' as to whether the records should be archived for permanent preservation under the custody of Jersey Heritage or confidentially destroyed.
- 4.3.3 The Departments are responsible for the implementation of the retention schedules; the Trust has no powers of governance and enforcement, only becoming actively involved again when records are appraised for disposal.
- 4.3.4 This is critical work and the retention schedule is a key artefact for implementing Records Management, which would be embodied as a fundamental part of each Records Management Plan.
- 4.3.5 In those Departments where a retention schedule has been produced, the process of identifying evidential records has been undertaken; the schedule acts as a useful reference model for this.
- 4.3.6 Within the Jersey Archives, all deposits are catalogued, with the industry-standard Adlib software used, and the register as such exists.
- 4.3.7 Within the States' departments, some work has been done on auditing, particularly in creating the retention schedules.
- 4.3.8 It is noteworthy that the planned Freedom of Information legislation does not institute the requirement for the production of Publication Schemes - i.e. published guide to classes of information that a public authority body is obliged to publish.
- 4.3.9 Generally, however, the inherent focus of the work to date is on process and practice at end of the record lifecycle. It does not address the implementation of standards for the handling of active and semi-active records before disposition. This is fundamental to ensuring that records are classified and stored in a manner that ensures their accessibility and protection, supporting information access requests under Freedom of Information, and would form part of the wider concept of the Records Management Plan.
- 4.3.10 **Our recommendation** is that the concept of the Records Management Plan is adopted as part of the new Strategy and the creation of these plans forms the core of the initial implementation Programme for Records Management. Led and monitored centrally by the Programme Board, the devolved implementation will be managed by the Records Management Champions.

- 4.3.11 In creating the template for the Records Management Plan, the new Information Manager and States Records Manager establish a method for identifying the processes of a Department, the records that need to be created and how they should be classified and stored dependent upon their nature, and establish a method for undertaking a Department-level information audit, creating an information asset register incorporating a retention schedule and associated publication scheme.
- 4.3.12 There is a direct cost in undertaking this action, which derives from the release of Records Management Champions from day-to-day duties in order to effect the implementation of the Plans. Please refer to section 4.21 below.

4.4 Records System Standard

- 4.4.1 Within the States, there is a variety of approaches to records storage, with a reliance on paper filing in many areas. Historically some internal facilities, such as the Bakehouse, were certainly not suitable in terms of the secure and environmental protection of records.
- 4.4.2 Many business teams using NTFS partitions (the L drive) for network filing. Training on the use of naming conventions was provided during the Office 95 rollout but this has not been enforced so is used sporadically in departments. There is also anecdotal use of the personal secure H drive for more general filing, thus leading to duplication or the inability to locate documents especially after an employee has left.
- 4.4.3 A number of different systems are in place for electronic document management, including increasing use of Microsoft SharePoint. For Electronic Document and Records Management (EDRM), the States embarked on an ambitious corporate programme in 2006 to deploy the Livelink system from Open Text on a corporate basis. This programme was put on hold in 2008 and currently there are perhaps some 840 licences in active deployment.
- 4.4.4 In writing this report, however, we recognise that the States is a varied and complex organisation covering all aspects of government. Therefore, whilst there should be (ideally) a single, corporate EDRM platform in place, probably based upon Open Text's Livelink solution, this would be a implementation programme lasting perhaps 4-5 years. There is most practically and urgently the need to establish a corporate standard for record keeping systems to ensure, whatever their nature, that best practice is followed to ensure the availability, confidentiality, authenticity and integrity of records.
- 4.4.5 There is no standard in place giving guidance on how records systems should be established.
- 4.4.6 **Our recommendation** is that a new working group, based on the current Records Manager Working Group, is established to generate corporate standards for Records Management. This activity would be led by the new States Records Manager. A priority action will be to develop the Records System Standard.

- 4.4.7 There is a direct cost in undertaking this action, which derives from the recruitment, salary and on-costs of these new Records Manager posts. and the release of Records Management Champions from day-to-day duties in order to participate. Please refer to section 4.21 below.

4.5 Records Retention Periods Standard

- 4.5.1 The Archivist has created a number of generic retention rules for all departments on finance, HR, project records and other 'corporate' document types. These are used as reference models in creating the departmental retention schedules and these will be published on the intranet site.
- 4.5.2 **Our recommendation** is that the new working group for standards reviews the current generic rules for completeness and their usefulness in managing and monitoring legal citations.
- 4.5.3 There is a direct cost in undertaking this action, which derives from the recruitment, salary and on-costs of these new Records Manager posts and also the release of Records Management Champions from day-to-day duties in order to participate. Please refer to section 4.21 below.

4.6 Records Classification Standard

- 4.6.1 Initially as part of the Open Text Livelink deployment it is understood that a lot of time and effort went into the development of file plans, for deployment both within NTFS and EDRM systems. However, their implementation has never been reviewed and there is no responsibility currently for their development and monitoring.
- 4.6.2 The fundamental work on design has been undertaken and this can be embodied within a specific standard and implemented as part of the Records Management Plan.
- 4.6.3 There is an acknowledged lack of corporate metadata and data quality standards; although Open Text did supply the States with 'JIPSV', a localised version of the descriptive Integrated Public Sector Vocabulary.
- 4.6.4 **Our recommendation** is that the new working group for standards reviews the current file plans for completeness, aligned to the departmental information audit process and published UK government classification schemes, and ensures they are based on the "F.A.T." principles.
- 4.6.5 There is a direct cost in undertaking this action, which derives from the recruitment, salary and on-costs of these new Records Manager posts and also the release of Records Management Champions from day-to-day duties in order to participate. Please refer to section 4.21 below.

4.7 Information Security Standard

4.7.1 There are various information security policies and procedures in place within the States; recently 36 policy related documents in this area have been consolidated to 12. This includes a draft States of Jersey information security classification document. This document establishes four classification levels and how to assign them based upon impact. The classifications are:

- Confidential (was Class A)
- Restricted (was Class B)
- Private (was Class C)
- Unclassified (was Class D)

4.7.2 We have not had sight of any documents that establish the storage (access control and protective marking), transmission and disposal arrangements to be put in place for records dependent upon their security classification.

4.7.3 **Our recommendation** is that the new working group for standards, following approval of the classification scheme, establishes the standard for Information Security measures for records.

4.7.4 There is a direct cost in undertaking this action, which derives from the recruitment, salary and on-costs of these new Records Manager posts and also the release of Records Management Champions from day-to-day duties in order to participate. Please refer to section 4.21 below.

4.8 Business Continuity Standard

4.8.1 We have not had sight of any documents that establish criticality levels for records in terms of continued business operation (e.g. Vital, Essential, Non-Essential) and the storage and recovery procedures to be put in place. However, sight of some of the responses to the Public Records Law Compliance Questionnaires sent out to 50 public institutions by the Archivist in 2008 shows that there are local business recovery plans address vital records.

4.8.2 **Our recommendation** is that the new working group for Standards, establishes the standard for Business Continuity measures for records.

4.8.3 There is a direct cost in undertaking this action, which derives from the recruitment, salary and on-costs of these new Records Manager posts and also the release of Records Management Champions from day-to-day duties in order to participate. Please refer to section 4.21 below.

4.9 Offsite Storage Facility

- 4.9.1 There is still a large reliance on paper filing in many areas. There are certainly large filing registries in departments such as Health, Social Security, Planning and Law Officers. Social Security also use the basement, Health services use the tunnel at St Saviour's Hospital. Where semi-active filing is stored away from office space, this is either done utilising internal premises or externally contracted file storage providers, such as G4S, using by Planning and Social Security. Law Officers rent an archive building and are in discussion with the Police about a dedicated Criminal Justice store. All such choices are based on local decisions and budgets.
- 4.9.2 Many records within the States will be permanently preserved within the Jersey Archives, meaning that there is the need to provide large amounts of storage space. Whilst the Jersey Archives can take early deposits of semi-active records designated as being of historic archival value, and do indeed store records for Children's Services, the Jersey Archive has space pressures. If current transfer volumes continue, the Jersey Archives facility will be full by 2017.
- 4.9.3 The emerging accommodation strategy (with plans for rationalisation of the office estate) acknowledges the need for such a facility and business demand was expressed during meetings held.
- 4.9.4 Originally there was the intention to build a further facility at the Jersey Archives location for Records Management; this land is still available. However, the project was shelved.
- 4.9.5 **Our recommendation** is that a priority task for the Programme Board, working in conjunction with the Property Holdings, is to identify a suitable facility, either based on the conversion or new-build of in-house premises or the arrangement of a corporate contract with an external provider.
- 4.9.6 There is a direct cost in undertaking this action, which derives from the conversion / new-build or placing of a corporate contract for a storage facility for semi-active physical records. Please refer to section 4.21 below.

4.10 Corporate EDRM Platform

- 4.10.1 Electronically, many business teams are using NTFS partitions (the L drive) for network filing. There is also anecdotal use of the personal secure H drive for more general filing, thus leading to duplication. or the inability to locate documents especially after an employee has left.

- 4.10.2 For Electronic Document and Records Management (EDRM), the States embarked on an ambitious corporate programme in 2006 to deploy the Livelink system from Open Text on a corporate basis, piloting this in Education. 3,600 licences were purchased in 2005. Subsequently the maintenance costs for Livelink were reduced to £95,000 per annum based upon the usage of 1,200 licences. This programme was put on hold in 2008 subject to the acknowledgement of the need for the programme to be more aligned to a corporate business case and process of business process improvement. It is also acknowledged that adoption was hindered by a reluctance to move away from the L Drive. Currently there are perhaps some 840 licences in active deployment.

4.10.3 Usage of Livelink is summarised within the table below:

Department	Users	Usage
Economic Development	84	Used for general document management of MS Office files
Health & Social Services	26	Holds scanned images of inactive medical records (i.e. older than 5 years)
Airport	141	Only 12 active users for project management records
Human Resources	77	Used for day-to-day personnel records (providing comfort of security)
Probation	73	Holds scanned images, acting as document repository for the case management system
Magistrate Court Greffe	13	
Treasury	22	Archive document repository for old pension management system (new system has integral document management system)
Information Services	59	Used for general document management of day-to-day business documents (although project documentation now managed within SharePoint)
Education, Sport and Culture	15	The pilot for Livelink as an EDRM platform in 2006, holding education policy records – only area where configured for electronic records management, although no disposals actioned
Law Officers	51	Wholly dependent on use for managing electronically generated case records; also want to use imaging

Department	Users	Usage
Corporate Applications (see below)	279	
Ministerial Decision Making	-	Used for the decision sign-off process (the only Livelink workflow application)
Customer Relationship Management	-	Provides the document archive for the Microsoft CRM system
Project Management Office	-	Was used for Information Services project management, although now using SharePoint
Jersey Land and Property Index	-	Provides the Local Land and Property Gazetteer of address data storage and retrieval

- 4.10.4 There are other requirements for the use of Livelink that have emerged, including: the deployment of workflow for Law Officers, the storage of minutes and agendas by Chief Ministers and a correspondence management solution for Customs & Immigration.
- 4.10.5 There are also a number of other document management applications in use, chosen for their best fit purpose; examples include 'NESSIE' within Social Security, the use of JD Edwards for storing scanned images of invoices, the 'Giles' system used by States Greffe for policies and the 'Raindrop' property database. Recently there is the increasing use of Microsoft SharePoint for collaborative document management applications on an ad-hoc basis. There is no formal strategy for SharePoint deployment.
- 4.10.6 None of the systems except Livelink and SharePoint (for which there are still doubts regarding its retention capabilities, particularly for more complex, case-based processes) provide integral electronic records management functionality. All Livelink licences available within the States have the records management features. However, only the Education department has configured Livelink for electronic records management, although no disposals processes have actually been run; indeed Education have stated they would like to start with a clean sheet. The rest of Livelink usage is mainly for day-to-day document management. The fact that disposal arrangements for electronic records are not routinely considered is also evidenced by Jersey Archives receiving very little to date under their digital preservation programme.
- 4.10.7 Strategically, the vision for a corporate-wide EDRM implementation is valid. The States should identify the platform for this, which can be 'called down' for use in more immediate areas of business need. Open Text is an industry-leading vendor with a product suite that provides imaging, document management, records management, collaboration and workflow capabilities. They have made an indicative offer to the States that is appealing and competitive. Furthermore, Livelink can also provide a platform for physical records management activities, such as file / object tracking and disposal management, replacing many of the current spreadsheets and databases used for such purposes. Whilst the States has the availability of SharePoint to them under their Premier Agreement with Microsoft, this platform is not yet proven or really suitable for corporate records management and therefore should be used on a 'best fit' basis as a time-bound workspace for collaborative processes, such as projects and policy development.
- 4.10.8 **Our recommendation** is that an agreement is reached with Open Text for the provision of 3,600 licences and the use of Livelink as the strategic platform for EDRM is embodied within standards, policies and plans.
- 4.10.9 There is a direct cost in undertaking this action, which derives from the investment in software licences, annual support, external professional services and internal resources. Please refer to section 4.21 below.

4.11 Information Management Policy

- 4.11.1 There is no specific Information Management policy in place. The relevant policies of which we have had sight are to support the activities of the Jersey Trust and historic archiving process; please see section 4.12 below.
- 4.11.2 **Our recommendation** is that the new Information Manager and Records Manager establish an Editorial Working Group. This could be the current Records Manager Working Group, although time would need to be allocated for their input and effort. They would establish the programme of editorial work, gather and assess existing documents, produce and gain approval for a series of corporate policy and procedure documents. The Sponsor would give endorsement to the Policy.
- 4.11.3 There is a direct cost in undertaking this action, which derives from the recruitment, salary and on-costs of these new Records Manager posts and also the release of Records Management Champions from day-to-day duties in order to participate. We also recommend that professional, external consultancy assistance is used to create the suite of policies, standards and procedures, providing expert input on their scope and contents. Please refer to section 4.21 below.

4.12 Records Management Policy and Procedure

- 4.12.1 Currently there is a robust, well-written policy in place to support the activities of the Trust and historic archiving process. This includes:
- Records Appraisal Policy
 - Jersey Archive Digital Preservation Policy
 - Jersey Archive Access Policy
 - Guidance Notes for Public Institutions (on the Public Records (Jersey) Law, 2002)
- 4.12.2 This is supported by the development of retention schedules for all public institutions (with 12 approved to date).
- 4.12.3 A draft Records Management Policy exists; however, this dates from 2006, has been never been approved and is really still a working document.
- 4.12.4 There is of course plenty of good practice and documentation at the local level – for example, the Police use of a localised version of the UK Management of Police Information (MoPI) guidance, Law Officers have a records management policy, Social Security provide guidance on how to write case notes etc. This can be assimilated and re-used during an 'editorial' review process.
- 4.12.5 The States has also produced a comprehensive and very useful 'Editorial Guidelines' document.

4.12.6 **Our recommendation** is that the new Editorial Working Group, following completion of the corporate Information Management Policy, focuses on the creation and approval of a comprehensive suite of policies and procedures for Records Management, assimilating existing, local good practice as available.

4.12.7 There is a direct cost in undertaking this action, which derives from the recruitment, salary and on-costs of these new Records Manager posts and also the release of Records Management Champions from day-to-day duties in order to participate. Please refer to section 4.21 below.

4.13 Information Access Policy and Procedure

4.13.1 No policies and procedures for the Freedom of Information practice and processes have yet been written. In terms of roles and responsibilities, there will be a close relationship with the dedicated Records Management policies.

4.13.2 **Our recommendation** is that the new Editorial Working Group includes the development of Information Access (FOI) Policies and Procedures within its remit.

4.13.3 There is a direct cost in undertaking this action, which derives from the recruitment, salary and on-costs of these new Records Manager posts and also the release of Records Management Champions from day-to-day duties in order to participate. Please refer to section 4.21 below.

4.14 Records Management Programme Board

4.14.1 There is no dedicated Board or governance structure for Records Management in place at the States. However, there are the building blocks in place for establishing this.

4.14.2 The recently established Records Management Steering Group could be instituted into a Board. The Jersey Trust Archivist would play a lead role, although as discussed in section 4.18 below, because of resource issues, there is the need for further functional expertise. One of these new appointments, such as a States' Records Manager, if agreed, would fulfil the Programme Manager role.

4.14.3 There is also an active Records Manager Working Group, constituted of personnel within each Ministry who actively regard Records Management as part of their function. Many of the constituents are also the nominated Public Records Officer required by the Public Records Law. Consideration would be required as to whether they were Plan Owners or ideally placed as the local Practitioners, or whether for expediency they fulfilled both roles.

4.14.4 **Our recommendation** is that a formal governance structure is put in place, based on a dedicated Programme Board for Records Management, with the new States' Records Manager nominated as Programme Manager.

4.14.5 There would also ideally be a political lead (such as Minister for Treasury and Resources) and union representation.

4.14.6 There is a direct cost in undertaking this action, which derives from funding the dedicated post(s) for Records Management. Please refer to section 4.21 below.

4.15 Records Management Plan Owners

- 4.15.1 The Public Records Law (Jersey) 2002 sets out that each institution will have a Public Records Officer. Many of these officers also have recognised departmental Records Management responsibilities. Consideration would be required as to whether they were Plan Owners or ideally placed as the local Practitioners, or whether for expediency they fulfilled both roles. The allocation of responsibility for any department FOI Co-ordinators (and the structure of the FOI process is still under consideration at the States) will also need to be taken into account, as these officers may also be best placed to fulfil that role, as well as undertake Data Protection duties.
- 4.15.2 If they are not to become the Plan Owners, then they will need to be senior business managers having the authority, the commitment and the resources to help establish and maintain the States' RM Programme at the departmental level.
- 4.15.3 **We are not yet in a position to make a recommendation** on this whilst further decisions are being made on the FOI process. However, this should be treated as a matter of priority.

4.16 Records Management Practitioners

- 4.16.1 As stated above, there is an active Records Manager Working Group, constituted of personnel within each Ministry who actively regard Records Management as part of their function. (note though that only the representative from the Law Officers department is formally a 'Records Manager' by title.) Many of the constituents are also the nominated Public Records Officer required by the Public Records Law. These officers would be highly suitable to manage the creation and implementation of Records Management Plans.
- 4.16.2 **Our recommendation** is that there is formal recognition of departmental-level Records Management Practitioners, given suitable remit and time to engage in a range of activities supporting the Records Management Programme.
- 4.16.3 There is a direct cost in undertaking this action, which derives from the release of Records Management Champions from day-to-day duties in order to effect the implementation of the Plans. Please refer to section 4.21 below.

4.17 Scrutiny and Challenge Panel

- 4.17.1 Scrutiny and challenge could be provided by the Records Advisory Panel. This Panel, instituted by the Public Records Law (Jersey) 2002, meets four times each year to review and advise on the performance and activities of the Trust, the Archivist and the public institutions of their functions under this Law.
- 4.17.2 **Our recommendation** is that the remit of the Records Advisory Panel specifically includes scrutiny and challenge of the Records Management Programme.
- 4.17.3 There is no direct cost in undertaking this action.

4.18 Information / Records Management Team

- 4.18.1 The Public Records Law (Jersey) 2002 required an officer be employed as an Archivist. A Head of Archives and Collections is in place, working for the Jersey Heritage Trust. Fundamentally the Archivist manages the appraisal, preservation, conservation, appreciation and use of records that are of significant evidential and cultural value, thus worthy of permanent preservation under custody of the Trust.
- 4.18.2 The Archivist is supported by a team of 7.5 staff.
- 4.18.3 The current post holder is a records management (as well as historic archiving) professional. The remit includes preparing and updating retention schedules. The skill set is there to become more involved within active and semi-active records management. However, there are two issues: the Archivist works for the Trust rather than the States; and the Trust already requires additional Records Management resource (please see 4.18.4 below) to handle the 24 year cataloguing backlog as well as develop and manage processes to handle Freedom of Information requests. In 2004 staffing at Jersey Archive was cut by over 30% and they will lose a further temporary resource at the end of 2010.
- 4.18.4 Within the 2008 report by Dr. Norman James of The National Archive, Dr. James recommended an additional 3.5 FTE posts at the Archive to ensure that Public Records legislation is met. However in the short-term and as a direct consequence of FOI legislation and anticipated request handling, in addition to these posts Jersey Heritage would request a 5 year temporary cataloguing contract to ensure that pre-2000 public records were catalogued and ready for consultation 5 years after the Law is adopted by the States.
- 4.18.5 In assessing the need for Information / Records Management professionals within a dedicated corporate function, one must consider that records are information: i.e. data materialised as result of processing, manipulating and organising data in a way that adds to the knowledge of the person receiving it, with the document being the primary container of information. Thus Records Management is closely aligned to Data Protection, Information Security, Data Quality, Business Continuity and other information management fundamentals. It is noteworthy that the UK Records Management Society has now approved a change of name to the Information and Records Management Society. There are also other aspects to Freedom of Information apart from record keeping that require corporate expertise and management. This includes establishing policy and procedure, monitoring process compliance, providing a point of escalation and advice. This role could also embrace the handling of Data Protection subject access requests and other information-related matters of compliance with law and policy.
- 4.18.6 It is therefore important to consider the establishment of an integrated corporate function, covering Records Management and Information Access / Compliance practitioners under a dedicated Information Manager.

- 4.18.7 **Our recommendation** is that an Information Manager (with line responsibility for all matters of information governance, joining up policy and assuring resource) is appointed as a States officer, reporting to the existing Chief Information Officer of the States. It is understood that this post was recommended by the Control and Auditor General after the HMRC breach review.
- 4.18.8 Reporting to the Information Manager would be a Records Manager (responsible for managing the Records Management Programme and leading the development of specific standards policy and procedure) and two Information Access Managers, all States officers. At least one further resource would also be provided to the Jersey Heritage Trust for their Records Management activities.
- 4.18.9 There is a direct cost in undertaking this action, which derives from the recruitment, salaries and on-costs of these new posts. Please refer to section 4.21 below.

4.19 Communications Campaign

- 4.19.1 Currently the Café Cyril intranet pages on Records Management are being updated by the Archivist. These will include information on the Public Records Law, retention and the advice available from Jersey Archives. Approved retention schedules will also be published.
- 4.19.2 This is a good start. However, there needs to be a concerted campaign to publicise the strategy and its benefits, expectations and obligations of staff, as well as a range of guidance covering the whole records lifecycle. It is also important to communicate key decisions and the quick wins – it has been commented that what works in the States is showing by example.
- 4.19.3 The campaign must be memorable and probably utilise mixed media techniques. This includes:
- Production of consolidated, cross-referenced documentation, with quick reference guides
 - Circulation of updates and briefing notes (electronic newsletter, e- mail, notice boards)
 - Maintenance of a dedicated intranet area
 - Interactive questions answered approach, e.g. within the intranet
 - Roadshows, surgeries and floor-walking
 - E-Learning where possible
 - Use network of ‘Champions’ (i.e. the Records Management Practitioners)
- 4.19.4 When publishing policy and procedure on the intranet, a software approach could be used to gain acknowledgments that read and understood, potentially with content-based tests on this understanding. It is understood that the NETconsent tool has been piloted.
- 4.19.5 There is also the need to embed Records Management within the HR lifecycle. It is understood that Human Resources would be amenable to this, particularly for Civil Service posts.

4.19.6 **Our recommendation** is that the new States' Records Manager works closely with the Archivist, in liaison with HR and Communications teams, to create and deliver an effective corporate campaign.

4.19.7 There is a direct cost in undertaking this action, which derives from the need for tools and materials. Please refer to section 4.21 below.

4.20 Training Programme

4.20.1 There is no corporate Records Management training or competency scheme. Although there is ad-hoc Livelink training this only covers document management and does not cover records management. However, sight of some of the responses to the Public Records Law Compliance Questionnaires sent out to 50 public institutions by the Archivist in 2008 shows that there is training on filing within the Departments, managed on a local basis.

4.20.2 A comprehensive training schedule needs to be prepared for all staff, covering the standards and procedures for Records Management. Fundamentally all office staff need to understand how and where to file and archive evidential records, taking into account considerations of availability, security and retention. They need to understand how to use the tools available to them, including the use of Livelink for electronic filing. Without suitable training good practice will not be consistently and robustly applied; also bad practice will perpetuate. Effective training is also an inherent part of the communications campaign to get across objectives, benefits and principles as well as new ways of working.

4.20.3 **Our recommendation** is that the new States' Records Manager works closely with the Archivist, in liaison with HR, to create and deliver an effective training programme, aligned to the Communications Campaign. An Information Management Competency framework can be established, potentially based upon the UK Government Knowledge and Information Management (GKIM) Professional Skills Framework, as well as best practice within the BS ISO 15489 Records Management Standard.

4.20.4 There is a direct cost in undertaking this action, which derives from the need for tools and materials. Please refer to section 4.21 below.

4.21 Summary of Costs

4.21.1 There will be direct costs to implementing an effective and sustainable management system for Records Management. These can be put into seven areas of expenditure:

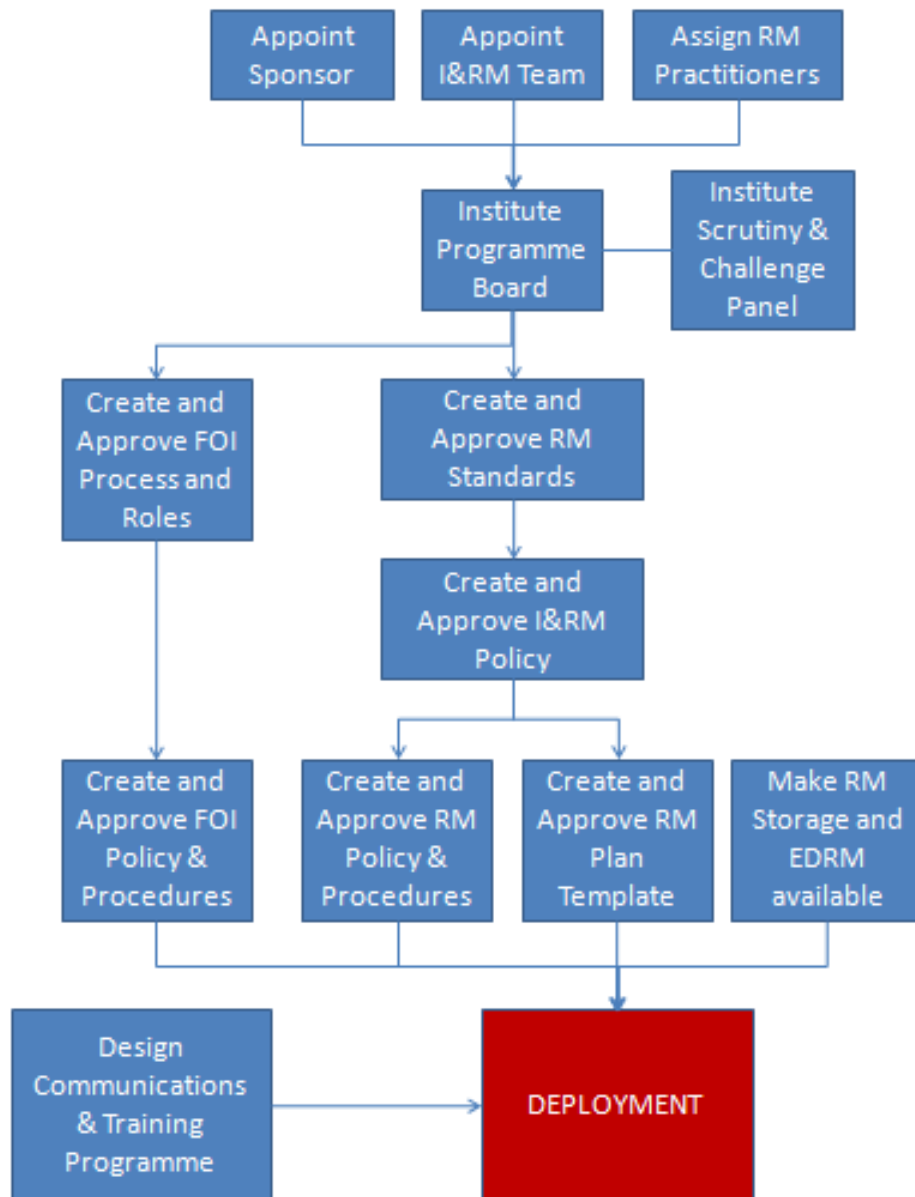
- Staffing the dedicated Information & Records Management Team, with posts for the States' Information Manager, the States' Records Manager, the additional records management resource at the Jersey Archive and the two States' FOI Practitioner posts
- Funding the release of the departmental Records Management Practitioners, providing alternate resource to cover other aspects of their work whilst these officers are dedicated to the Records Management Programme - in the first year of the Records Management Programme they are likely to give up 100% of time and in subsequent years they are likely to give up 25% of time

- Providing an offsite Storage Facility for semi-active physical records, including the costs for design and build, staffing, recurring building maintenance and supplies
- Investing in the software, professional services and systems administration resource to make Open Text's Livelink the corporate platform for EDRM
- Providing tools and materials to support the Communications Campaign
- Delivering a comprehensive Training Programme
- Using external consultancy to support development of documentation

Area of Expenditure	One-off Costs £	Annual on-going Costs £
Staffing of Information and Records management team		
One off recruitment costs	6,000.00	
Staff costs (5 FTE)		284,000.00
Time for departmental records management practitioners		
Year 1 (26 FTE)	1,404,000.00	
Staff costs @ 25% (26 staff)		351,000.00
Offsite storage & staff costs		
Building of storage facility	2,120,000.00	
Staff cost (3 FTE)		120,000.00
Recurring building maintenance and supplies		48,000.00
Livelihood EDRM		
Cost for 3,600 licences	400,000.00	
Staff cost for EDRM support (1 FTE)		54,000.00
Professional service and support from supplier		105,000.00

Area of Expenditure	One-off Costs £	Annual on-going Costs £
Communications		
Staff costs and material for communicating changes		5,000.00
Training		
Half day records management seminars @ 5,000 staff (100 sessions)	27,000.00	3,780.00
Half day intro to document management @ 4,000 staff (400 sessions)	108,000.00	20,250.00
Full day Livelink training @ 4,000 staff (400 sessions)	180,000.00	33,750.00
Records Management consultation		
External consultation	18,000.00	3,600.00
Totals:	4,263,000.00	1,028,380.00

4.22 Order and Flow of Action



4.23 Records Management Roles and Responsibilities Diagram

