

A. Introduction

The Audit Commission ("Audit") conducted a review of the records management work of the Government Records Service ("GRS").

2. The Committee did not hold any public hearing on this subject. Instead, it asked for written responses to its enquiries.

B. Overseeing of records management programmes

Records management programmes

3. According to paragraphs 2.3 and 2.4 of the Director of Audit's Report ("Audit Report"), the Director of Administration had issued the Records Management Manual ("RMM") to prescribe the code of practices for establishing records management programmes in government bureaux/departments ("B/Ds"). To better understand how B/Ds managed records, the Committee enquired about the details of the work procedures.

4. In her letter of 19 December 2011 in *Appendix 15*, the **Director of Administration** provided a flow chart showing details of the actions and procedures involved in each key stage of records management. She also stated that:

- as prescribed in the RMM, B/Ds should institute and implement a comprehensive records management programme to provide proper handling of government records through establishing control for the creation, organisation, maintenance and disposal of government records throughout their organisations; and
- some of the work processes presented as sequential in the flow chart might take place simultaneously, e.g. records creation and classification were often carried out as an integrated series of actions.

Compliance with mandatory records management requirements

5. As stated in paragraph 2.7 of the Audit Report, General Circular No. 2/2009 "Mandatory Records Management Requirements" ("the Circular") introduced a

number of mandatory records management requirements, including management of e-mail records, records classification, records disposal (such as destruction of records subject to prior consent of GRS Director and transfer of records having archival value to the GRS), custody and storage of records, and protection of vital records. The Committee asked how the GRS ensured that B/Ds would comply with the mandatory requirements of the Circular and whether there were punitive measures for non-compliance.

6. The **Director of Administration** said in the same letter that the following measures were put in place to ensure B/Ds' compliance with the requirements:

- requesting heads of B/Ds to accord appropriate priority and resources to implement records management programmes in their organisations;
- requiring B/Ds to appoint Departmental Records Managers ("DRMs") to oversee the departmental records management programmes and providing training, briefings and written advice to DRMs. As members of Executive Officer ("EO") grade were often heavily involved in records management duties in B/Ds, the GRS would strengthen the training for EOs by including records management in the mandatory development programme for EO I starting from January 2012;
- conducting focused records management seminars for records managers and records management staff in selected B/Ds to increase their awareness of the mandatory records management requirements. Such seminars had been organised for the Hong Kong Police Force, Social Welfare Department, Lands Department, Housing Department and Fire Services Department;
- conducting service-wide surveys on records management practices of B/Ds with focus on their compliance with the mandatory requirements. The GRS had conducted the first survey in the second half of 2010 and would initiate another survey in the second half of 2012;
- for the three mandatory records management requirements with a deadline of April 2012 (i.e. to adopt the GRS standard classification scheme and disposal schedules for administrative records, to establish draft disposal schedules for programme records and to draw up an action plan identifying and protecting vital records), monitoring B/Ds'

compliance through their submission of quarterly reports with effect from September 2011;

- upon completion of the current round of records management studies for all B/Ds in 2012, conducting comprehensive records management reviews/audits of individual B/Ds to monitor their compliance with the mandatory requirements; and
- reminding B/Ds to re-circulate the relevant General Circulars at regular intervals.

7. The **Director of Administration** also said that the mandatory records management requirements were of equal application and force to the Government Regulations, and were binding on all government servants. For any non-compliance with the requirements, the staff concerned would be subject to disciplinary action, including verbal/written warnings, reprimand, severe reprimand, reduction in rank, compulsory retirement and dismissal, depending on the circumstances and severity of the misconduct/offence.

C. Management of archival records

Records appraisal and workload of the Public Records Office

8. According to paragraph 4.3 of the Audit Report, the Public Records Office ("PRO") of the GRS carries out records appraisal to determine what records have archival value and should be retained permanently, and what records may be destroyed. The Committee enquired about the following:

- (a) the PRO's criteria for determining the archival value of records;
- (b) the number of man-hours that the PRO spent on carrying out appraisals on one linear metre of records; and
- (c) based on the estimate of the GRS, when it could clear the backlog of 59,000 records appraisals as mentioned in paragraph 4.4 of the Audit Report.

9. In her letter of 19 December 2011, the **Director of Administration** replied that:

- (a) the GRS had developed a set of appraisal guidelines in July 2009 based on the experience of other countries, with a view to providing a general framework to assist in the selection of archival records in a coherent and consistent manner. According to the guidelines, records likely to be selected as archival records might include the following:
- records that document or reflect the organisation, functions and activities of the Government;
 - records that document the formation process, implementation and outcome of significant policies, decisions, legislation and actions of the Government;
 - records that document the impact of the decisions, policies and programmes of the Government upon the physical environment, community, organisations and individuals;
 - records that document the interaction between the public and the Government as well as between the physical environment and the Government;
 - records that document the legal rights and obligations of individuals, groups, organisations and the Government; and
 - records that contain significant or unique information or aged documents that can enrich the understanding about the history, physical environment, society, culture, economy and people of Hong Kong;
- (b) there were currently three Archivist grade staff at the GRS responsible for records appraisal. Based on the time they spent on records appraisal, about 0.8 man-hour was required for appraising one linear metre of records in 2010; and
- (c) the GRS would explore measures, including seeking additional resources according to the established mechanism, in order to clear the backlog of 59,000 records appraisals in three years' time.

Destruction of records before appraisal by the PRO

10. The Audit Report revealed that in 2006 and 2007, the records centre, with the consent of the two government departments concerned, destroyed 2,815 time-expired records which were yet to be appraised by the PRO. In one of the above cases, the GRS had prepared microfilm images of the records before destruction but the PRO had not made use of the microfilm images to appraise their archival value. The Committee asked what the 2,815 destroyed records and the archival value of the microfilmed records as appraised by the PRO were.

11. The **Director of Administration** replied in her letter that:

- (a) 326 time-expired records destroyed by the records centre belonged to the Home Affairs Department. The remaining files were related to bankruptcy and liquidation cases of individuals and companies from the Official Receiver's Office ("ORO"). According to the microfilm of the records, these files involved 838 bankruptcy and 616 liquidation cases; and
- (b) regarding the records belonging to the ORO, the PRO, after appraising the microfilm of the paper records, had confirmed the archival value of the microfilmed records and stored them in the GRS.

12. The **Director of Administration** also said that the GRS, after investigation of the two cases, had counselled the staff concerned and reminded them to strictly follow the procedures for handling records disposal. In addition, the GRS had reviewed the relevant procedures and introduced a disposal check form to control the disposal process by setting out clearly the steps and the responsible officers involved. Since the implementation of such measures, there had been no inadvertent destruction of records by the records centre.

Condition survey conducted in 2002

13. According to paragraph 4.15 of the Audit Report, the GRS had commissioned a conservation adviser in 2002 to conduct a condition survey of its archival and library holdings and the results showed that about 30% of around 1,600 selected items were in a deteriorated condition. The Committee asked about the condition and degree of deterioration of those items.

14. The **Director of Administration** stated in her letter of 19 December 2011 that the GRS's conservation adviser classified the conditions of 1,611 selected items into five categories: viz. "Very good", "Good", "Middle", "Deteriorated" and "Very deteriorated". A total of 529 items (32.8%) were classified as "Very good" or "Good", 643 items (39.9%) were classified as "Middle" and 439 items (27.3%) were classified as "Deteriorated" or "Very deteriorated". For the 439 items classified as "Deteriorated" or "Very deteriorated", the **Director of Administration** also set out the details of their condition and degree of deterioration in her letter.

15. The **Director of Administration** further said that in light of the preservation strategies formulated based on the condition survey's findings, the GRS had implemented some measures apart from pursuing good handling and housekeeping practices. Such measures included housing each and every archival items in protective enclosures, enhancing insect and pest control, strengthening the GRS's professional capability to preserve and conserve archival items by entrusting the responsibility to the Curator grade since January 2008, enhancing climatic monitoring of the repositories and conducting another condition survey in October 2011 to revisit various strategies for improving the preservation of the GRS's holdings.

Accessioning and description of archival records

16. Accessioning is the process of registering and arranging the archival records before they are made available for public inspection. As stated in paragraph 4.27 of the Audit Report, up to June 2011, the GRS had a backlog of 280,000 archival records pending accessioning. In considering that the GRS on average completed accessioning of 30,000 archival records every year, Audit estimated that the GRS would take more than nine years to clear the backlog. The Committee enquired about the details of the action plan drawn up by the GRS to clear the backlog and when the backlog could be cleared.

17. The **Director of Administration** provided, in the same letter, the details of the action plan to clear the backlog of archival records, as follows:

- adopting a simplified approach since July 2010 for records description, which described archival records according to international standards and prepared different finding aids before records were made available

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for public inspection, so as to shorten the process while providing the core descriptive information to facilitate on-line search;

- accessioning those records which would soon reach 30 years first so that they might be opened for public inspection when they reached 30 years; and
- speeding up the accessioning work through additional resources, including deployment of a temporary research assistant to assist in records accessioning since November 2011.

18. The **Director of Administration** also said that the GRS expected to clear the backlog of 280,000 archival records in three years' time.

D. Manpower of the GRS

19. The Committee asked whether the Administration considered that the current manpower of the GRS was sufficient for carrying out its different types of records management work, and whether there were plans to increase its manpower.

20. The **Director of Administration** responded in her letter that:

- there were three officer grades in the GRS, i.e. the Archivist, EO and Curator grades. Archivists were mainly responsible for selection and management of archival records, EOs were for records management while Curator grade staff undertook the duties of conservation and preservation of archival records;
- to enrich the professional knowledge and expertise of the above three grades of staff, records management training was provided to them and arrangements were also made from time to time for them to attend international conferences and seminars so that they might share experience with overseas archival and records management institutions; and
- notwithstanding the above, the GRS would continue to keep under review the establishment of different staff grades so as to ensure work quality and the provision of good service to the public for access to

archival records, and seek additional manpower as appropriate according to the established mechanism. The Administration would also review the GRS's work processes to further improve its efficiency and effectiveness, and monitor the situation closely to ensure that the GRS had sufficient manpower to cope with the workload.

E. Conclusions and recommendations

21. The Committee notes the above replies of the Director of Administration. Given that there are a number of outstanding issues to be sorted out which may be related to the Government's overall policy on records management, the Committee recommends that the related issues be followed up by the Legislative Council Panel on Constitutional Affairs.

22. The Committee also wishes to be kept informed of the progress made in implementing the various recommendations made by Audit.