


Organisation	Somerset County Council	
Title	Records Management Policy	
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Owner	Information Governance Manager	
Protective Marking	Unclassified	

POLICY ON A PAGE

Somerset County Council will ensure all those responsible for all records during their full life cycle from creation to destruction are aware of the rules that apply to managing them effectively and efficiently.

This policy provides information on the types of records that are within scope, the rules and guidance that must be followed, the standards to be maintained, the risk to users, clients and the Council and the potential consequences of misuse

This document will be distributed to: **All Elected Members, Somerset County Council Staff, 3rd Party Contractors, Seconded and Volunteers**

Key Messages

- Everyone who use Council records must ensure their effective management, thus ensuring security, accountability, transparency, usability, reliability and integrity of SCC records.
- All users must be trained in the effective and secure management of records and personal data.
- All offices that create, store, use and destroy data must keep a log to show where personal data files are, at any point in time, to mitigate the risk of loss or disclosure.
- All records will be marked according to SCC's approved Protective Marking scheme
- Records, paper and electronic, will be stored in a secure and professional manner to enable them to be easily searched and accessed for the purposes of compliance with the Data Protection Act, Freedom of Information Act and related legislation.
- Records, paper and electronic, will be transmitted / transported in a secure and professional manner to minimise the risk of them being lost or stolen.
- Records should be shared with partners and clients and third parties given that all appropriate consents have been obtained and all statutory obligations have been met.
- If you are unsure as to how to manage Council records securely and effectively contact the Records Management Service.

This “policy on a page” is a summary of the detailed policy document please ensure you read, understand and comply with the full policy

Revision History - to be revised annually from publication date

Revision Date	Revisor	Previous Version	Description of Revision
01.11.11	Andrea Binding	v.01	Initial Draft
13.11.11	Peter Grogan	v.02	Technical updates
25.11.11	Andrea Binding	v.03	Final amendments
13.03.12	Peter Grogan	v.04	Reformatting
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Document Approvals

Document Approvals

This document requires the following approvals:

Approval	Name	Date
Information Governance Manager	Peter Grogan	30.07.2012
SIRO	Richard Williams	20.03.2012
Unions / JCC	Carrie-Anne Hiscock	25.02.2013
SCC HR	Richard Crouch	25.02.2013
Elected Members	David Huxtable	

Document Distribution

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FULL POLICY DOCUMENT

1 Policy Statement

The Lord Chancellor's Code of Practice on the Management of Records under Section 46 of the Freedom of Information Act 2000 recommends all public authorities should *"have a policy statement, endorsed by top management and made readily available to staff at all levels of the organisation, on how it manages its records, including electronic records"*.

The Local Government Act 1972 section 224 states *"A principal council shall make proper arrangements with respect to any documents that belong to or are in the custody of the council or any of their officers"*.

Somerset County Council (SCC) recognises that records are an important corporate asset that is vital to the effective functioning of the organisation. It recognises records are a source of administrative, evidential and historical information, which support current and future operations and provide the corporate memory of the Council.

SCC is committed to the promotion and maintenance of an effective records management system and record-keeping practices throughout the Council, for the lifecycle of all records, in all formats.

SCC will ensure that every officer and elected member is aware of, and understands, their responsibilities for the effective management of records, throughout the records lifecycle, from creation to disposal or retention as a corporate archive.

SCC will ensure all records created and maintained comply with legislative, regulatory, financial and best practice obligations.

2 Purpose

In accordance with the recommendations contained in The Lord Chancellor's Code of Practice on the Management of Records under Section 46 of the Freedom of Information Act 2000 to ensure public authorities practice good records management, the policy:

Aims to ensure that records held by SCC are managed effectively, with due regard to legal obligations, records management principles and standards and codes of practice.

Provides a framework for the effective and efficient management of records to ensure SCC consistently captures authentic, accurate, accessible, complete, comprehensive, reliable, secure and useable records into its record-keeping systems, which meet business needs, conform to statutory requirements and ensure accountability and transparency.

Ensures that SCC can control the quality and quantity of information it generates, can maintain that information in an effective manner and can dispose of the information securely and effectively when it is no longer needed. It will ensure unnecessary duplication and retention and enable efficient storage.

Ensures records are created and maintained with sufficient metadata, within an appropriate business classification scheme, so their context can be identified and interpreted easily.

Ensures all records have a designated owner who is responsible for maintaining the records in line with the policy and standards.

Ensures records are managed securely throughout the records lifecycle.

Ensures records are held for the correct length of time to meet legislative, regulatory, financial and administrative requirements and that records are timely disposed of once this use is concluded and prevent premature destruction of Council records.

That records are adequately stored and maintained and records systems are monitored for effectiveness. Ensures records with corporate or historical value are identified and retained as an archive.

Outlines each officer's and elected member's responsibilities for ensuring all records of the Council are managed in compliance with the Records Management Policy. It will ensure officers and elected members are adequately trained in the management of their records within their sphere of responsibility.

Contributes to improving the corporate capacity and service performance of SCC, by providing support and evidence of policy and decision making and the operation of the Council.

3 Scope

The policy applies to all Employees, Elected Members, Committees, Services, Partners and contractual third parties and agents of the Council who have access to records held or processed by SCC. It stipulates their duties and responsibilities for the effective management of records, in order to comply with the policy and legislative, regulatory, financial and best practice requirements.

The policy applies to the management of all records, in all mediums, throughout the records lifecycle, from creation to disposal or retention as a corporate archive.

SCC undertakes a wide range of activities, with different record-keeping systems and requirements in operation. This policy aims to provide a broad framework for the effective management of records, across all directorates and activities that support service policies and procedures.

4 Definition

This document defines the framework for policy, practice and procedure to ensure the effective management of records created and maintained by SCC. It defines how records should be managed throughout the records lifecycle, from creation, to disposal or retention as a corporate historical archive.

4.1 Records Management - Records Management can be defined as:

*"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 activity and transactions in the form of records"*¹

4.2 Record - A record can be defined as:

*"Information created, received and maintained as evidence and information by and organisation or person, in pursuance of legal obligations or in the transaction of business"*²

4.4 Many documents or items of information are created and used every day by SCC officers and elected members. However, not all created documents will constitute a record. Records are those documents which provide evidence of an action, a decision or a transaction and which are required for a certain period of time in order to meet legal

¹ ISO 15489-1, 3.16 Terms and definitions – p.3

² ISO 15489-1, 3.15 Terms and definitions – p.3

obligations or administrative need. Records are fixed and not subject to change. We create records for:

- Compliance
- Evidence
- Information
- Service delivery
- Business conduct
- Accountability
- Cultural and historical purpose
- Corporate memory

4.5 Records may be in any format and can be:

- Electronic files
- Paper files
- Emails
- Video footage
- Photographs

4.6 To support the key principles of effective record-keeping, records must be:

- Authentic
- Accurate
- Accessible
- Complete
- Comprehensive
- Compliant
- Reliable
- Secure

4.7 Examples of records include:

- Policies, procedures, reports and decisions
- Committee minutes
- Employee HR records
- Client case records
- Planning applications
- Financial transactions
- Project files
- Health and Safety records
- Contract records
- Legal records

It is therefore essential to distinguish between those documents that are 'records', that evidence statutory and other functions and have a stipulated retention period and those that are ephemeral and have no significant operational, informational or evidential value once their primary purpose has been served and which can be routinely destroyed. Examples of ephemeral records include:

- Personal / duplicate copies of records
- Working drafts where the official document has been created
- Announcement notices and attendances of meetings
- Requests for internal services (e.g. room bookings, maintenance)

- Requests and confirmations of reservations with third parties after invoices have been received (e.g. travel and hotel accommodation)
- Transmission documents (e.g. fax cover sheets, compliment slips)
- Superseded address lists and distribution lists
- Visitor's signing in books
- Trade magazines
- Supplier catalogues
- Obsolete manuals
- Supplies of superseded publications

Effective records management will ensure the key principles are met and support the organisation in decision making, achieving obligations and service delivery.

5 Risks

Somerset County Council recognises that there are risks associated with management of records in order to conduct official Council business.

This policy aims to mitigate the risks. This will ensure compliance with other key record-keeping policies and legislative obligations, including the Local Government Act 1972, 2000 and 2003, Data Protection Act 1998, Freedom of Information Act 2000, etc. There are a variety of risks, some of which can culminate in the Information Commissioner applying fines in excess of £500,000.

Examples of the common risks associated with poor record-keeping practices are:

- Loss or Theft
- Inappropriate destruction
- Data breach
- Inconsistent or poor levels of service
- Unnecessary costs – storage, wasted staff time, etc
- Insufficient administrative and technical controls
- Poor decision making, based on inaccurate or incomplete information
- Malware
- Lack of accountability and transparency
- Lack of business continuity
- Loss of public reputation
- Loss of corporate memory
- Non-compliance with legislative, regulatory, financial or best practice obligations

Non-compliance with this policy and the Lord Chancellor's Code of Practice on the Management of Records under Section 46 of the Freedom of Information Act 2000 could have a significant effect on the efficient operation of the Council and may result in financial loss, legal loss or an inability to provide necessary services.

6 The Policy Detail

The policy describes the framework for managing records within SCC.

6.1 Roles and Responsibilities

The Executive

- Is responsible for endorsing a corporate framework for managing records as set out in this policy.
- Is responsible for ensuring inclusion of records management in the corporate risk assessment framework and business continuity plan.

- Is responsible for supporting the delivery of an effective and efficient records management system that supports service delivery and complies with legislative, regulatory, financial and administrative practices.
- Is responsible for ensuring adequate resourcing for an effective records management system, for both paper and electronic records.
- Is responsible for providing a link between information management professionals within the organisation, the e-government initiative, relevant legislation and records management practices.

Directors

- Are responsible for ensuring contractors and agents delivering services to SCC have an effective records management policy and record-keeping practices, that meet the requirements of this policy and statutory requirements, such as the Data Protection Act, etc.
- Are responsible for ensuring record-keeping systems and business classification schemes are embedded in policy and procedures for their specific functions.
- Are responsible for ensuring officers are aware of, and comply with, practices and procedures.
- Are responsible for ensuring records are managed in accordance with specific legislative requirements.
- Are responsible for ensuring Group Managers have designated records management responsibility for their specific functions.
- Are responsible for ensuring staff with specific records management responsibilities have these clearly defined in their job descriptions.

Managers

- Are responsible for identifying and safeguarding records considered vital to the organisation in business continuity plans.
- Are responsible for ensuring records created, used and disposed of by officers are managed in accordance with this policy.
- Are responsible for ensuring officers are adequately trained in records management, according to their role, and are aware of and adhere to, the Records Management Policy.
- Are responsible for ensuring officers are aware of SCC's obligations regarding access to information and compliance.
- With the Corporate Information Governance Manager, are responsible for determining sensitivity and defining access restrictions for classes of records.
- With the Records Manager, are responsible for determining the appropriate retention period for records, in accordance with statutory obligations and business need.
- Are responsible for ensuring records are routinely prepared and deposited with the Records Management Service once administrative use is concluded.
- Are responsible for authorising disposal of records in a timely manner once statutory and administrative need is concluded.
- Are responsible for ensuring confidentiality and security of records throughout the records lifecycle, from creation to disposal.
- Are responsible for ensuring records with significant corporate or historical value are offered to the Somerset Archives and Local Studies Service as soon as statutory and administrative use is concluded.

Officers, Elected Members, Contractors and Agents

- Are responsible for creating and maintaining records in connection with their work that are accurate, authentic, reliable, and usable that support business aims and objectives,

that adhere to relevant legislation, policy and guidance and the Records Management Policy.

The Records Management Service

- Will provide a management, storage, retrieval, disposal and appraisal service for semi-current records of the Council.
- Will deliver advice, guidance and training to directorates as required.
- Will raise awareness of record-keeping practices throughout the records lifecycle.
- Will identify records that are of corporate or historic importance and will transfer these to the Somerset Archives and Local Studies Service for permanent preservation.
- Will determine legal admissibility and evidential value of records when determining and applying retention periods and prior to disposal of records.
- Will ensure compliance with professional practices and codes of practice.
- Will ensure records are retained in accordance with applicable retention periods, as governed by statutory, legislative, financial and administrative requirements.
- Will assist with development and approve all record-keeping systems and functions, for all mediums of records.
- Will review the Records Management Policy annually.

6.2 Training and Awareness

Since all SCC officers and elected members are involved in creating, maintaining and using records, it is vital that everyone understands their records management responsibilities as set out in this policy.

Managers will ensure that officers responsible for managing records are appropriately trained or experienced and that all officers understand the need for the proper management of records. Managers will ensure all officers are fully compliant with directorate business classification schemes and metadata standards.

A training programme will be established to ensure that all officers are aware of their responsibilities for records management. The Records Management Service will advise on or carry out records management training where required.

Records management should form part of the induction process for all officers.

6.3 Metadata standards

In order to search for information successfully, and to provide auditable evidence of the provenance of documents, records must have sufficient metadata attached to them.

Metadata must remain attached to the record in order to provide its context, for example when records are migrated to other systems or storage facilities. The way in which this is achieved will vary according to whether the document is paper or electronic and whether it is managed within an EDRM system. SCC will work towards standardising metadata standards in order to facilitate searching across the authority.

6.4 Classification Scheme

All records will be classified in accordance with corporate and specific directorate classification schemes.

Classification schemes will incorporate security classifications and access controls specific to the category and sensitivity of the information they contain, as defined by [HMG](#). Using [HMG](#) security

classifications, records will be classified as either RESTRICTED, PROTECT or UNCLASSIFIED and the content appropriately assessed as personal or sensitive data as defined by the Data Protection Act 1998.

Consistent classification of records is essential in order that the context of records is clear within the overall organisational structure and to facilitate searching or browsing for information with the Council's systems.

Records must be categorised in a systematic and consistent way in order to facilitate their capture, maintenance, retrieval and disposal and to link them with the functions and activities of the organisation.

A hierarchical system of classification should be adopted. This means that information is categorised at the highest level by the functions of SCC (i.e. directorate), then by the activities which the Council carries out to achieve those functions (i.e. group) and finally by service or subject-based criteria.

SCC will work towards adopting a corporate classification scheme. Two schemes specific to local government are currently available: the Local Government Classification and Retention Scheme (LGCRS), compiled by the Information and Records Management Society and the Local Government Category List (LGCL), developed by the LAWs project.

The use of process mapping will aid in the development of classification schemes.

6.5 Directorate Record-Keeping Systems

Each directorate and service will have in place record-keeping systems that adequately document their activities and which provide for rapid identification and retrieval of information. Record-keeping systems must capture records that are authentic, accurate, accessible, complete, comprehensive, compliant, reliable, secure and useable and which have integrity.

When designing a new record-keeping system (or re-organising systems), directorates should utilise the methodology set out in the Records Management Standard ISO15489-1:2001 Information and Documentation Part II to ensure that the requirements of the system are set out and met. A summary of this methodology can be seen in Appendix A.

Records management should be integrated into processes, procedures and workflows, rather than treated as a separate task.

Record-keeping systems should provide for the capture of records into the system, in whatever format, and in such a way that they can be linked with other records relevant to the subject.

Record-keeping systems must take into account the legal and regulatory environment specific to the area of work and should adhere to specific retention periods, as governed by statute and best practice.

Record-keeping systems should be compliant with the Records Management Service procedures, to enable records to be easily transferred to off-site storage when they become semi-current.

Information about records which are readily available to the public should be made available through the Council's Publication Scheme, under the Freedom of Information Act 2000.

Record-keeping systems should:

- Classify records in such a way that they can be identified and retrieved quickly and efficiently, according to the corporate classification scheme and taking account of any personal, sensitive or commercially valuable content
- Include sufficient metadata that is attached to records so that they can be set in context
- Apply access and security controls, in accordance with the corporate security classification as defined by HMG for RESTRICTED and PROTECT data.
- Control file movement, issue, return, physical location and deletion, thus providing effective audit trails
- Ensure regular maintenance to ensure effectiveness and management of the records they contain
- Enable cross referencing of electronic and paper records
- Enable records to be managed in accordance with statutory and best practice requirements
- Embed retention policies and procedures
- Enable routine and timely appraisal and disposal of records, in accordance with retention policies and procedures
- Include guidelines and procedures to ensure it's proper use

6.6 Maintenance and Storage of Records – Local Offices

Record keeping systems within directorates must be maintained so that records are properly stored and protected, and can easily be located and retrieved. This will include:

- Ensuring that adequate storage accommodation is provided on-site for records
- Monitoring the movement and location of records so that they can be easily retrieved and that provide an audit trail
- Controlling access to records in line with SCC security classification and the Data Protection Act 1998
- Ensuring that records which are no longer current, but which need to be retained for further periods of time to meet legal, financial or administrative requirements are transferred to the Records Management Service for management and storage, rather than being stored in local offices
- Records will be retained in accordance with the [Records Retention Policy, Generic Retention Schedule](#) and service specific retention schedules.
- Records will be destroyed in accordance with the [Data Destruction Policy](#) and comply with security and confidentiality requirements.
- Records must maintain their integrity, accessibility and reliability when transferred to other storage. In particular, this will apply when they are transferred to different media (for example when paper records are scanned).

6.7 Maintenance and Storage of Records - Records Management Service

Once records cease to be required on a regular basis, i.e. become semi-current or 'dormant', they will be transferred to the Records Management Service for off-site storage and management.

Records transferred to the Records Management Service will be deposited in accordance with the Service's policies and procedures. This will include compiling a comprehensive list of all deposited records, their inclusive dates and applicable retention periods, updating current metadata and thus maintaining their integrity, accessibility and reliability.

The Records Management Service will undertake a Records Survey and compile a service specific Retention Schedule for all classes of records it holds.

Records will be retained in accordance with the Records Retention Policy, Generic Retention Schedule and service specific retention schedules.

Records deposited with the Records Management Service will be stored and managed to standards as recommended by The National Archives, The Lord Chancellor's Code of Practice on the Management of Records under Section 46 of the Freedom of Information Act 2000 and ISO 15489-1:2001.

Once records cease to be required, i.e. once statutory and administrative retention periods have expired, the Records Management Service will contact depositing services to request authorisation for appraisal and/or disposal.

Records will be destroyed in accordance with the [Data Destruction Policy](#) and comply with security and confidentiality requirements.

Records will be appraised prior to disposal for possible archival preservation (see 6.8 below).

6.8 Permanent Preservation

SCC has a requirement under the Public Records Act and Local Government Acts to retain records that have significant value or interest permanently in archival quality conditions. For this purpose, the Somerset Archives and Local Studies Service is classified as a 'place of deposit' under the Public Records Act.

Records identified for permanent preservation will be managed and stored in accordance with their archival value prior to transfer to the Somerset Archives and Local Studies Service.

Managers are responsible for ensuring records with significant corporate or historical value are offered to the Somerset Archives and Local Studies Service as soon as statutory and administrative use is concluded.

The Records Management Service will identify such records as part of their Records Survey programme, thus embedding permanent preservation identifiers into service specific and generic retention schedules.

The Records Management Service will appraise records for possible archival preservation as part of its appraisal programme prior to disposal of records.

The final decision on the permanent preservation as an archive record will rest with the Somerset Archives and Local Studies Service.

All records retained for permanent preservation will be catalogued, managed and stored to archival standards, in accordance with the Public Records Act, The National Archives and BS ISO 5454, which provides recommendations for the storage of archival documents.

Records will be subject to any applicable closure periods, as required by the Data Protection Act and The National Archives standards.

Records will be stored and managed as defined by their sensitivity, in accordance with data protection and protective marking requirements, as defined by HMG and the Data Protection Act, 1998. Records will only be produced to owner teams in order to safeguard confidentiality.

As required by the Freedom of Information Act 2000, a public right of access will be provided, subject to any applicable exemptions or closure periods.

Records to be retained for permanent retention are likely to be those which:

- Provide evidence and information on policies and decisions
- Provide evidence and information about service delivery
- Contribute to the Council's corporate, cultural or historical memory
- Contribute to the County's cultural or historical memory
- Are required for permanent preservation, as stipulated by statute

6.9 Sharing of Records within the County Council

In order to minimise duplication of records and to ensure version control, consideration should be given to sharing those records that contain information required by more than one section of SCC.

Personal and sensitive information may be shared within SCC provided that there is a legal basis and necessity for doing so, and provided that all the Data Protection principles are met.

6.10 Sharing of records outside the County Council

Personal and sensitive information may be shared with partners provided that there is a legal basis and necessity for doing so, and provided that all the Data Protection principles are met. This includes:

- Having the necessary consent from the data subject
- Having a data sharing agreement in place with the other organisation
- Ensuring that suitable security arrangements are in place for the safe transfer and storage of the information
- Ensuring that RESTRICTED information is only shared using GCSx mail

6.11 Standards and Legislation Relevant to Records Management

Record-keeping legislation and standards relevant to Local Government include:

Legislation

- Local Government (Records) Act 1962
- Local Government Acts 1972 , 2000 and 2003
- Local Government (Access to Information) Act 1985
- The Data Protection Act 1998
- The Freedom of Information Act 2000
- The Environmental Information Regulations 2004
- The Public Records Acts 1958 and 1967 (as amended by the FOI Act 2000)
- Open Government Initiative
- Limitation Act 1980
- Privacy and Electronic Communications (EC Directive) Regulations 2003
- Local Government Finance Act 1992
- Audit Commission Act 1998

Codes of Practice

- The Lord Chancellors Code of Practice for records management, made under section 46 of the Freedom of Information Act 2000
- BSI DISC PD 0008 Code of Practice for legal admissibility and evidential weight of information stored on electronic document management systems
- BS7799 Code of Practice for information security management and information security guidelines

Standards

- BS ISO 15489-1:2001 Information and Documentation – Records Management
- BSI DISC PD0010 Principles of good practice for information management
- BSI DISC PD0012 Guide to the practical implications of the Data Protection Act 1998
- The National Archive standards for the management of public records
- Local Government Classification and Retention Scheme by the Information and Records Management Society of Great Britain

Other legislation, specific to certain activities of the Council will give record- keeping guidance and should be taken into account.

Other legislation and guidelines governing generic areas such as contracts or records required for audit will apply to the Council in the same way as it applies to all other organisations.

Appendix 1

Governance Arrangements

Policy Compliance

If any employee is found to have breached this policy, they may be subject to Somerset County Council's [disciplinary procedure](#).

Where it is considered that a criminal offence has potentially been committed, the Council will consider the need to refer the matter to the police.

If you do not understand the implications of this policy or how it may apply to you, seek advice from the Records Management Service.

Policy Governance

The following table identifies who within SCC is Accountable, Responsible, Informed or Consulted with regards to this policy. The following definitions apply:

- **Responsible** – the person(s) responsible for developing and implementing the policy.
- **Accountable** – the person who has ultimate accountability and authority for the policy.
- **Consulted** – the person(s) or groups to be consulted prior to final policy implementation.
- **Informed** – the person(s) or groups to be informed after policy implementation.

Responsible	Records Manager
Accountable	SIRO Head of Client Services
Consulted	County Archivist, Corporate Information Governance Manager
Informed	All elected members, employees, contractors and volunteers

Review and Revision

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 12 months. Policy review will be undertaken by the Information Governance Manager

References

Internal guidance on the Records Management Service is available to officers and elected members via the Intranet.

The following Council policy documents are relevant to this policy, and may be referenced to within this document.

- [Corporate Information Security Policy](#)
- [Data Protection Policy](#)
- [Information Transparency Policy](#)
- [Acceptable Use Policy](#)
- [Legal Responsibility Policy](#)

Appendix A

ISO15489-1:2001 requirements for new record-keeping systems

ISO 15489 sets out a methodology to be followed when new record-keeping systems are being contemplated.

There are eight steps, A-H set out in the process, some of which may be left out or merged together, depending on the complexity of the system contemplated.

Step	Purpose	Product examples
A: Preliminary investigation	An understanding of the business, social, administrative and legal context the organisation operates in	
B: Analysis of business activity	Develop a model of what the organisation does and how it does it	Business classification scheme Process mapping: showing where records are produced
C: Identification of requirements for records	What records does the organisation need in order to carry out its business activities?	List of regulatory, financial, legal requirements to keep certain records Risk assessment
D: Assessment of existing systems	Measuring how the existing systems meet the requirements for records	Inventory of existing systems Gap analysis
E: Identification of strategies for meeting records requirements	Determine policies, procedures, standards and tools necessary to ensure that the right records are created and kept	Mapping of strategies to requirements Overall design of system
F: Design of records system	Converting strategies in step E into solutions that meet the needs identified in steps C and D	Systems specification File plans System implementation plan
G: Implementation of records system	Put in place strategies to implement the design of system set out in step F	Detailed project plan Training plan
H: Post implementation review	To measure effectiveness of the system	Assessment methods Reports to management