“Outline the records management programme that is operated within your organisation. Discuss how well this programme matches recommended standards and principles in its structures, procedures and operation.”

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1. Introduction

The Records Management team is the functional unit responsible for records management, data protection and freedom of information programmes within Westminster City Council. The Council, situated in the heart of London, serves about 244,600 residents and 1.1 million people who visit or work in the capital during the day. It employs about 6200 staff in six departments, and since July 2001 has operated a Leader and Cabinet-style of executive management.

This essay reviews the first six years of the records management programme’s development, before attempting to take a current “snap-shot” of its policies, structure and core operations. These activities are benchmarked against established UK and international standards, and found in general to be a good example of “conventional” records management within a local authority context. However it is argued that the service urgently needs to consolidate its grip of the wider information management and e-government agenda if it is to take advantage of the available opportunities and avoid stagnation, and that this service growth must be supported by a significant increase in resources.

2. Background to Records Management at WCC – Phase 1 1995-1998

A report to the Policy and Resources Committee in April 1995 by the Records Retention Working Party described the of control of contemporary records within the organisation. The Working Party had been established to investigate the options and it was recommended that a centralised Records Management Centre (RMC) be established
within the Facilities & Supplies Clientside, led by a professional records manager. Whilst recognising statutory duties under the Local Government Act 1972 to “make appropriate arrangements” for record-keeping in the interests of accountability and efficiency, the authority was also keen to exploit the financial benefits of removing inactive records from expensive office storage and ensuring the timely disposal of expired records.

A rudimentary Records Management Policy and Retention Schedule was agreed by the Committee and incorporated into the Council Code of Governance. The Code tasked departments to create and implement detailed local retention policies, and advised on basic manual file management practices. The report was duly noted and a capital and revenue budget allocated. It was proposed that the latter budget be recovered through departmental recharge – based upon the model at that time within Berkshire County Council.

A Records Manager was appointed in August 1995 and she immediately set about developing procedures for the transfer of semi-current and inactive records into an existing storage area. This facility was conveniently located in the basement of City Hall, on Victoria Street. Formerly known as “Muniments”, with a reputation as an unmanaged and dirty repository of forgotten documents, the newly refurbished RMC promised to solve the immediate needs of the Council as identified in the report. It is interesting to note that the new purpose-built City of Westminster Archives Centre also opened in 1995 and that the City Archivist played a key role on the Records Retention Working Party and in recruiting the Records Manager.
A core of three temporary Records Assistants was recruited in November 1995 to help establish RMC procedures and to list the first consignments of records for storage. Using in-house knowledge a Microsoft Access database was created to hold item-level descriptions of files, to manage the allocation and storage of boxes and to track retrievals. The first wave of intense growth in records centre holdings, due to a phased refurbishment of City Hall and a concurrent squeeze on office space, now began. Up to eight temporary staff were hired to list the initial influx of records from various departments and off-site storage areas, and by April 1996 a Records Centre Co-ordinator was appointed to manage the increasingly complex chain of transactions and devolve listing responsibilities to owner departments.

In September 1996 the co-ordinator/supervisor was recruited on a permanent basis, as were two full-time assistants from the existing records team. Service growth was dependent upon the confidence departmental managers had in the new RMC, faith hard-won through the successful early integration of legal, financial, social services and personnel records into the record-keeping system. At this time the team designed a written questionnaire and distributed it to users, the results informing the first Service Level Agreement and providing the basis for a pertinent academic article written by Gabriel Olawande – a central member of that team.

At this juncture the Records Manager let a tender to introduce document imaging to the Council against the allocated capital. Given the specification and market conditions, it proved impossible to negotiate a satisfactory tender below the capital budget threshold, and the project was prematurely abandoned amidst much confusion as to the future
direction of the service. However the budget remained tied to the RM function and, as we shall see, this budget proved to be key to future developments.


In April 1997 the Records Manager left the Council, and the RMC Supervisor acted up in the interim. During this uncertain period there were proposals to re-locate the RM function to the post-room contractor, a move successfully resisted by the RM team. Arguments were made to the City Archivist that there were professional and strategic benefits in transferring the service to the Archives Business Unit within the Education Department, and on 1st January 1998 this move was endorsed. The Records Centre Supervisor was promoted to the position of Records Manager in May 1998, prompting another round of recruitment and a re-shuffle within the team.

As befits a local authority business unit, the RM function created its first Annual Service Development Plan in March 1998. Its Mission Statement was to “store, retrieve and suitably dispose of Westminster Council’s essential records, in order to meet legal, financial, operational and archival requirements”. In addition to service improvements and initiatives to increase market penetration, the development plan recognised the high maintenance costs and weaknesses in the current Access database and strove to replace it with a commercial off-the-shelf application. The plan also recognised the as yet unmanaged area of corporate electronic records, and envisioned a hybrid application that would serve the needs of manual records management and permit an expansion in the range of RM services to e-mails, Word documents and Excel spreadsheets.
Towards the end of 1998 the RMC approached its full capacity of 14,000 boxes and, after a short-term arrangement with a local storage contractor, a three-year partnership was agreed in June 1999 with Wansdyke Security Ltd - based in Wiltshire - to provide storage, retrieval & disposal services.

Many hurdles had to be negotiated before the capital budget could be allocated, including the commissioning of document management consultancy. A tender exercise for this consultancy commenced in September 1999 and the resulting feasibility study was presented to Members at the Information Strategy Advisory Panel in December of that year. Following technical approval the report then went to the Educational Operational Sub-Committee in Feb 2000, where the authority was granted to spend the capital budget on this project based on the predicted tangible benefits and value for money. The tender phase began in March 2000 and in September 2000 a vendor (Dialog) and a product (TRIM Captura 4.3) was approved.

In keeping with its new ambitions for electronic records, the RM function departed from the Archives Business Unit and was re-located to Corporate Information Services in January 2001. This surprise move, lobbied strongly by the RMT, joined the previously unrelated functions of RM & IT and promised to greatly increase the profile of Records Management and the likelihood of making a corporate impact. The new Records Management application, TRIM by Tower Software, went live in November 2001 and a third phase in the RMT’s history began. This essay derives its snapshot of current policies, structure and core operations from the beginning of this new era.
4. Records Management Policy & Strategy

The original Records Management Policy agreed in 1995 remains in force, although a new draft policy has been published on the RMC website and is under consultation with a view to formal adoption later in 2002. The focus of the existing policy and it brief guidance notes has three interrelated weaknesses.

First, the RMC itself is seen as the start and finish of effective corporate records management. By pitching guidance to staff at the stage in the records continuum/lifecycle when semi-active or inactive records need to be removed from the office, the policy suggests that RM is what you do only once or twice a year during a move or clear-out. This “spring-clean” approach, whilst superficially effective in meeting the warehousing needs of the organisation, does nothing to address the greater information management obligations upon departments and staff – and in its simplicity tends to delegate issues of classification, vocabulary control, retention & security to the RM team.

Secondly, the policy does not address the creation and maintenance of current records. It is a truism that poor record-keeping today is tomorrow’s Records Centre problem, and that a corporate record-keeping culture is vital for the information health of an organisation. The policy does not address the ever-changing needs of contemporary departmental functions to keep records for accountability, operational needs, legislative requirements or historical research. By not appraising records at the point of creation, a large administrative backlog of miscellaneous folders is created that is expensive and sometimes demoralising for the owner to organise at a later date.
Thirdly, the policy does not recognise the increasingly important realm of electronic records. The growth in e-mail communication over the past five years has rendered the formal hardcopy memo a bizarre artefact from a different era. In the absence of a clear policy and corporate electronic records management facilities, staff are bewildered between the choice of printing-to-paper or retaining electronic documents in fragile, personal digital workspaces. Correspondence and client files were once comprehensively preserved in manual file folders, yet now every manual record rightly demands a warning sticker attached stating “Electronic Documents relating to this folder are located on various hard-drives, servers and floppies”. In an era of Freedom of Information and Data Protection this policy is no longer tenable, and the organisation does not comply with the Public Record Office (PRO) standard for File Creation, or Guidance on Electronic Record keeping. This issue will be re-visited in Section 11 below.

The new draft policy goes some way to alleviate these weaknesses; however it can be seen that the real problem lies in the promotion of active records management responsibility, and the allocation of roles and resources to deal with the issues at a local level. Note that new departmental resources or posts were not allocated to perform records management duties and to monitor compliance, and the absence of a cohesive network of divisional records officers remains a critical failure. The three-year Records Management Service strategy recognises these structural weaknesses and provides for an enhanced consultancy and training role that the RM team can play to prepare the Council for e-government. This will inevitably requires additional resources.
The existing RM policy, despite its weaknesses, marked an important transition stage in the development of the RM programme at Westminster. Whilst having a limited impact upon active record-keeping and ignoring electronic records, there is no doubt that the policy has provided a mandate for RMC operations and ensured its adoption as the corporate document repository for inactive and semi-active records.

5. Structure of RM function

The RM team consists of four permanent staff. The Corporate Records Manager (CRM) has responsibility for the strategic leadership and development of the RM function, electronic records initiatives, and corporate Data Protection and Freedom of Information compliance. This is a recent expansion of responsibilities for this post, and is linked to the relocation of RM to the Information Services section, which previously had co-ordinated compliance with the 1984 Data Protection Act. The role, directly responsible to the IT Development manager, has a wide range of duties, not least that of the promotion and marketing of records and information management throughout the organisation. Perhaps the greatest challenge is to introduce policies and procedures, to provide advisory services and to supply the training and development opportunities so that all Council staff become records managers in their day-to-day routines.

Directly responsible to the CRM, the Records Centre Manager (RCM) has full operational responsibility for the RMC, managing Records Officers, premises, data and customers. The job embraces the frontline responsibilities of the Records Officers, demands the tactical approach of the middle manager to plan for service development and provides strategic support to Council-wide RM initiatives. It is important that the RCM does not focus exclusively on the internal operations of the centre, and strives to
maintain and develop links with administrators and managers throughout the Council in order to stay in touch with the organisation’s active record-keeping. In essence, the job is a bridge between strategy and service.

Two permanent **Records Officers** (RO) provide the backbone of RM operations, although due to rising service demands this squad has recently increased to four through temporary recruitment. The RO’s are graduates, not necessarily with an RM background, who enjoy the challenge of managing the transfer of records to the RMC and are competent in performing the routine and sometimes non-routine task of retrieving and returning records. One of the RO’s has recently assumed part-time responsibility for data protection administration, supporting the CRM. It has been proposed that this post should be extended to a full-time position and a business case is being prepared to create two new permanent RO’s. The RO role is key to the effective functioning of the RMC and combines a brain and brawn skill-set that is increasingly recognised as a professional duty.

It is often that case that RO’s are the public face of the RM function and training and development opportunities are offered to and exploited by these staff. The RM team currently has two distance learners on post-graduate MSc RM courses, one part-time student on the RM3 initiative and one part-time student on a Management Diploma. Temporary staff have also benefited from training through external courses run by independent bodies.

The general structure of the RM function is typical of large in-house Records Management Units. Its position in the organisation is apt, being close to the core of
IS/IT. It can be argued that the staffing arrangements and organisational position match the ideal outlined in the Lord Chancellor’s Code of Practice on the Management of Records under Freedom of Information, and comply with the recommendations with the PRO Standard “Human Resources”.

6. RMC operations - project management

The core of RMC procedures has remained static for many years. Let us assume that a business unit manager wishes to transfer records. A call or e-mail to the RMC will prompt a “preliminary visit” to the office concerned. The preliminary visit always offers a challenge and opportunity for the RM staff. Customers are typically short of time and patience when it comes to their records – they seek a quick and easy solution to remove them from sight. Other customers may be extremely concerned about the security, efficiency or general competence of the RMC to deal with highly valued and sensitive information.

In all cases a confident, knowledgeable and presentable member of the RMC team must quickly appraise the record-set, suggest a controlled vocabulary, establish an approximate retention schedule and agree on resource commitments to complete the “boxing project”. Once this framework is established a Microsoft Excel template is installed on an appropriate server, box assembly is demonstrated, physical “archiving” techniques are explained and a few files are given an RMC record number, listed on the spreadsheet and placed in a box. The manager of the unit is then invited to supervise the rest of the project and asked to call the RMC when it is finished, normally within one month. RMC staff monitor the closure of projects to ensure a swift turnover of new business and increase the probability of accurate records transfer.
The traditional records survey, universally agreed in the RM literature as the stepping-stone for an effective RM programme, has been effectively downgraded to a five-minute browse against the pressures experienced at the point of records transfer. Compared to the PRO standard “Records Surveys”, the Westminster RM programme scores weakly in this area. In mitigation it appears that the concept of the records survey itself needs updating to reflect modern exigencies. The records survey should encompass all active record-keeping (including electronic records) and arguably the declaration of manual records to the RMC is not the appropriate moment for an inclusive, documented survey. More comprehensive surveys are offered on a consultancy basis, requiring additional project work for the RM team outside of the normal RMC operations, offering insight into the information management needs of the unit concerned. The service manager who exploits this consultancy without a directive from the hierarchy above is a rare species indeed, and the CRM must apply pressure to senior management for this to be addressed.

In the absence of an applicable corporate or departmental document retention policy, the RM team must also negotiate a retention policy and vocabulary controls in-situ – a task that requires great experience of the function in hand for it to be accurate and consistent with previous transfers. Although the Corporate Records Manager is available to research and advise on retention and classification, in practice undocumented and inconsistent decisions are made ad-hoc due to service pressures, sometimes with adverse results for retrieval and disposal operations (see also Sections 8 and 9 below).
7. RMC Operations - new consignment processing

Each box allocated to a customer has a unique number (e.g. 12500). This box is logged on the TRIM database as being with the customer upon delivery, and audited through a Box Delivery Note. Each file that a customer puts within the box must be marked with this unique record number, followed by a unique item number (e.g. 12500/1 or 12500/2). This reference must be entered as the box and item number respectively within the Excel spreadsheet, and acts a primary key within the TRIM database. It also acts a unique locator, verifying accurate retrieval and immediately confirming the identity of files in transit.

When the customer considers that the project is complete a secondary visit is arranged to check the quality of the boxing and to evaluate the data. If boxes are over-packed, files are unmarked, or the data is incomplete then RO’s will diplomatically reject the consignment and agree remedial measures with the user. The depositor of the records must complete a Consignment Note, summarising ownership, top-level description and access controls. When all is satisfactory the internal porterage service is instructed to transport the boxes to the RMC for processing.

When the consignment of boxes arrives RMC staff perform quality control to ensure compliance with agreed presentation, vocabulary and retention standards. The files are counted, a file is picked at random from each box and its details are checked against the Excel metadata. All corrections are annotated against a hardcopy of the consignment list before the Excel data itself is updated. Once the audit is complete the Consignment Note is signed and the receipt sent to the customer – informing them of any corrections. Many
errors are corrected by this procedure, and the hardcopies are filed to complete the audit trail. The data is then imported into the TRIM database and the boxes are allocated a shelf in the space management system.

The procedure is watertight and effective. Points must be gained also for the manner in which users must classify and declare their own records, and how RMC staff are deployed to maximum effect and not relegated to listing disparate documents from unknown sources.

8. RMC Operations – information retrieval & record tracking

Retrieval from the RMC is a simple and secure procedure. Users can e-mail, phone or fax their requests to the RMT, or increasingly interrogate their records via the secure TRIM WebDrawer interface, accessed via the corporate intranet, to place their online requests.

As suggested in Section 6 above, problems are sometimes encountered during retrieval because of inconsistent titling of records within the database, although creative searching is normally successful in these cases. Strict authorisation protocols are followed by RMC staff and any queries are referred to the respective manager with ownership responsibilities to confirm authorised user lists. Customers can expect retrieval of files within hours, as detailed in the Service Level Agreement.

A Retrieval Request Form is produced to accompany the file en route to its destination via a dedicated postal service and the requester is asked to sign the form to confirm receipt. These receipts, and any returned files, are in turn delivered to the RMC for processing. TRIM creates barcodes for each retrieved item and nothing leaves the RMC.
without its barcode being scanned. It can be seen that the procedures for Record retrieval largely match those of the PRO guide “Tracking Records”.

9. RMC Operations – Appraisal & Disposal

The framing of retention schedules, formally a departmental responsibility, has been neglected in many areas with the result that the RMT is often called upon to negotiate retention policies “on-the-fly” at the point of transfer (see Section 6 above). Whilst there is good coverage within Legal, Contracts, Personnel & Social Services, other departments remain blasé in their attitude to this core RM requirement and largely stems from the original weaknesses in the RM policy and responsibilities. The Social Services Document Management policy was a result of a RM-led initiative with senior managers and is arguably a de facto standard in local government.

Whether in adherence to a corporate policy or not, all records transferred to the RMC must have a “reasonable” review date. Each quarter a report is generated from TRIM that identifies those boxes that are due for review. Reports are issued to managers with ownership responsibilities, who are given one month to act upon the request to review. The RMC is authorised to act independently should a response not be forthcoming, however in practice this is rarely invoked to ensure the good will of customers. The inconsistent application of retention policies at the point of transfer increases the risk of premature or late appraisal and increases the administrative burden of this key process.

Nothing is destroyed without initial “archival” appraisal from the Corporate Records Manager, based upon knowledge and experience of the organisation and guidelines drawn up by the Archives Centre. Material of potential interest is set to one side for
formal archival appraisal by professionals from the Archives team. This is a successful relationship, ensuring the permanent preservation of over 150 files to date. All records not transferred to Archives, whether containing personal/sensitive personal data or not, are destroyed through a corporate contract for confidential paper disposal, and shredded to a high security specification.

From the perspective of the RMC, in general documents are appraised and suitably disposed, but this is an area that needs rationalisation and consolidation if the Council is to meet its requirements under Data protection and FOI. The procedure in general meets the PRO standard “Disposal Scheduling”.

10. RMC Storage – Premises

The RMC itself must be judged against BS5454 standards. An environmental survey during 1999/2000 proved that the facility could not meet the strict requirements of ambient humidity or temperature but this is not thought be a high risk for intermediate storage periods. The external storage contactor does meet these environmental standards. Security is good across both sites, with access restricted to authorised personnel only. Quarterly cleaning and cycles of pest monitoring are undertaken. The health & safety regime is strict, and fire maintenance and drills are performed. A vital records programme is in place to prioritise recovery of records from storage in the event of disaster, and the disaster plan itself is regularly revised in light of experience. An expert disaster recovery contractor, Document SOS, is paid an annual retainer to be on stand-by should the worst happen. A risk assessment of the RMC has been performed, and the greatest risk of damage to records has been shown to be minor leaks – a frequent cause for concern. Greater potential risks include the location of the RMC within the Thames
flood plain, and like the rest of central London an enormous burden of trust is placed in the Thames Flood Barrier. Despite these weaknesses the RMC is a satisfactory document repository.

11. The function in organisational context

The inadequacies of the RM programme are symptomatic of the greater information management weaknesses within the organisation. The Corporate Information Services unit has typically been preoccupied with IT projects that provide the technical infrastructure and very little thought has gone into promoting and exploiting the wider benefits of information management. The five principles of good information management practice detailed in the BSI document PD0010 are not upheld. A corporate classification scheme and comprehensive retention schedules are thus lacking, rendering records management an issue approached from the RMC perspective. There is no doubt that the majority of departments fail to meet the requirements of the PRO standard “File Creation” and “Electronic Records”. The RM team is currently piloting the use of TRIM for hybrid RM and the forthcoming results will inform enterprise electronic records management initiatives.

Another factor to consider is the rampant departmentalism within the Council, exacerbated by the fragmentation of services provided by contractors which serves against a corporate approach to Records and Information Management. Whilst the RMC may provide effective local security arrangements, the organisation is also a long way from compliance with BS7799. The high rate of organisational change and staff turnover does not provide continuity to keep the information management agenda alive, and all too often “filing duties” are delegated to these transient workers. No doubt improvements
could be made to the method of RMC recharging to make departments truly accountable for their RM decisions and expose the true cost of information management failure.

Despite organisational indifference at the top level, the RM function continues to provide a vital supporting role to many front-line and back-office Council services. The RMC markets itself reasonably well, and in August of 2000 the team developed an intranet site, placing user information and related material online. It is still one of the most innovative and up-to-date sites on the corporate web, and has gained over 3000 impressions since its launch.

The overarching context for the future of the RM programme is the Customer Service Initiative – a grand political scheme to outsource the organisation and channel services through a call centre scheduled for late 2002. As recognised in the Records Management Service strategy, this is a development that all services must support and it is uncertain what impact it may have upon the RM function.

**12. Evaluation against the Standards**

The modest guidance issued by the DETR & LGA on “proper arrangements” of paper and electronic records in local authorities has been largely superseded by the Lord Chancellor’s Code of Practice on the Management of Records under Freedom of Information. As outlined in Section 5 above, given the developing remit of the RM function at Westminster and its sound Records Centre operations it can be seen in general to be compliant with the main principles of this code.
The ultimate benchmark of the Westminster model is Section 7 of the international standard for Records Management (ISO 15489), which lists thirteen principles of a comprehensive RM programme.

a) Determining what records should be created in each business process, and what information needs to be included in the records. This principle is not adequately dealt with in the current Westminster RM programme.

b) Deciding in what form and structure records should be created and captured, and the technologies to be used. This principle is not adequately dealt with in the current Westminster RM programme.

c) Determining what metadata should be created with the record and through records processes and how that metadata will be persistently linked and managed. This principle is only adequately dealt with in the current Westminster RM programme for inactive and semi-active manual records.

d) Determining requirements for retrieving, using and transmitting records between business processes and other users and how long they need to be kept to satisfy those requirements. This principle is not adequately dealt with in the current Westminster RM programme, in particular retention policies and information-sharing protocols need improvement.

e) Deciding how to organize records so as to support requirements for use. This principle is only adequately dealt with in the current Westminster RM programme for inactive and semi-active manual records.

f) Assessing the risks that would be entailed by failure to have authoritative records of activity. By not addressing active records management, this principle is not adequately dealt with in the current Westminster RM programme – although risk assessment is performed on inactive records to a degree.
g) Preserving records and making them accessible over time, in order to meet business requirements and community expectations. *Through the provision of an effective manual records centre, this principle is partially achieved by the current Westminster RM programme. By extending the range of RM services to electronic records, as is being tested, full compliance may be achieved in the near future.*

h) Complying with legal and regulatory requirements, applicable standards and organisational policy. *In general this principle is partially achieved by the current Westminster RM programme through its security, audit trails and disposal cycle – albeit restricted to inactive and semi-active manual records.*

i) Ensuring that records are maintained in a safe and secure environment. *Through the provision of a secure manual records centre, this principle is partially achieved by the current Westminster RM programme. Electronic records remain at risk.*

j) Ensuring that records are retained only for as long as needed or required. *In the manual realm, this principle is adequately dealt with in the current Westminster RM programme. Electronic records remain at risk.*

k) Identifying and evaluating opportunities for improving the effectiveness, efficiency or quality of its processed, decisions, and actions that could result from better records creation or management. *Through innovative development of the RM function this principle is adhered to.*

l) Rules for creating and capturing records and metadata about records should be incorporated into the procedures governing all business processes for which there is a requirement for evidence of activity. *Whilst there exist rudimentary metadata standards for the declaration of inactive manual records, these standards do not yet extend to active or electronic records.*
m) Business continuity planning and contingency measures should ensure that records that are vital to the continued functioning of the organisation are identified as part of risk analysis, protected and recoverable when needed. **A vital records initiative is in place within the RMC, however it is recognised that the coverage for active manual and electronic records is weak.**

13. Conclusion

The strength of the existing RM programme lies mainly in its RMC operations, although the recent adoption of DP and FOI responsibilities and the consequent corporate impact should not be ignored. There are weaknesses in corporate policy, but these are being addressed with a revised policy out for consultation.

In comparison with other London local authorities Westminster has come a long way in six years to established UK and international standards. Key areas for improvement include electronic and active manual records management, although this situation is not uncommon in local government today. A PRO-approved product, TRIM, is in place to pilot electronic records management and inform future developments. It is imprudent for the Westminster RM service to rest on its laurels at this stage in its development since difficult challenges lie ahead in the form of interoperability standards for e-government, enterprise records management and the full impact of Freedom of Information and Data Protection legislation. The Customer Service Initiative may well prove to be the critical opportunity to grasp this agenda, although this will not be achieved without additional financial resources and a more elevated organisational profile. The third phase in the development of Westminster’s RM programme remains unfinished and unpredictable.
14. Bibliography