

Consultation questions

1. Are these Principles written in a way that is relevant and helpful to your work?

Response

They appear to be written in a jargon free manner, with due regard for the reader. They are clear in their meaning and we cannot suggest any amendment that would obviously improve the way in which they are written.

2. In your opinion, do the additional Principles included in this revised version of the Guidance make clear to public service providers what the Information Commissioner and the Ombudsman expect of them as regards good records management?

Response

Yes, we believe so in general. However we think that there should be an addition to Principle 8:

A Records Management Programme (RMP) backed up with schedules for retention, archiving and destruction for important types of record with clear policies and processes covering such things as “what is a record?”; priorities on what to keep and what not to keep, how long to keep them and how to provide access and ensure records are maintained in a fit state for access as well as who, where, when etc. This needs to take account of different paper and digital media in use in the past, now and in the future.

Why? “What is a record?” is a perennial issue in public service, especially with the use of so many types of digital record nowadays and social media. It is one which complicates records management and retention as the record of a single event may be multimedia with emails, documents, photos, computer transactions, drawings and recordings. You therefore need a simple and foolproof way to keep these separate components and reunite them should you need to refer back in years to come. With IT devices and software regularly being updated and replaced (or going obsolete) this does need to be thought through and constantly reviewed.

Following on from this, prioritisation is also really crucial. Good records management is not about keeping absolutely everything “just in case” – it is about setting clear priorities for what to keep and manage and doing so whilst at the same time disposing securely of the rest to get rid of the “clutter”.

3. Do you find the inclusion of examples (case studies) helpful to illustrate the behaviours being addressed by the Principles?

Response

Generally it was felt that they were helpful in an illustrative way, although in some cases it was not obvious, or readily apparent, why the case study had been chosen to illustrate that particular principle (e.g. one of the record management ones seemed to be more about lack of professional judgement and several of the “Fairness” ones seemed to also relate more to poor quality standards or, in one case, record management.

As a National Park Authority it was also felt that it would have been helpful to see more examples about planning related matters and other matters that apply to more than just Local Authorities. There are a wide ranging number of bodies who are now subject to the jurisdiction and examples should have been included in the document to reflect this.

4. Are there any words or terms that are unclear?

Response

Not as such, it all seemed clear and well written and presented in an accessible style. However, in the first example of Principle 1, the reference to an Undertaking, from the Information Commissioner does require the reader to have a working knowledge of the ICO’s procedures and the significance of an “Undertaking”.

This shows that care does need to be taken with the examples to ensure that the points they are illustrating are easy to understand for the reader.

5. Are there any additional principles which may be beneficial for inclusion/should anything else be included (for example, are there any other developments which you think need to be reflected in the guidance)?

Response

*One area which underpins much of what is covered here is Quality Management. This is implied in the Principles but not referred to directly and **this aspect of the guidance should, in our view, be strengthened in order to reflect good management practice.***

There is a whole body of knowledge on how to create a virtuous circle by establishing a quality culture and managing service quality:

- Being clear about outcomes and quality standards relevant to different customer sets;*
- Setting clear standards and measuring and reporting on results;*
- Making sure everyone is clear about their role and accountabilities in the process;*
- Actively seeking feedback and listening to customers;*
- Encouraging staff to come forward with problems, mistakes, suggestions and complaints – so that they are identified, acted on and learnt from as quickly as possible;*
- Monitoring results, managing problems and looking all the time for opportunities to improve;*
- Looking at what other people do to see if you can learn from their experience as well as your own;*
- Checking that improvements are having the desired effect.*

The elements that seem to us to most lack emphasis in this document are clear outcomes, monitoring, being proactive and looking outwards.

Professionalism of staff

All of this hinges on professionalism in the various disciplines that Local Authorities employ – Planning, Social Services, Education, Housing etc. The document could make more of this. It should also refer to the need for continuous development – which, of course is a professional requirement.

The document could perhaps make more reference to professional bodies and the standards that they set. There is a reference to “best practice” but that is a bit vague. Most of the work of Authorities is covered by professional institutes and other standards bodies so it would be good to acknowledge them as a source of good practice and continuous professional development and perhaps reference them. For example the Information and Records Management Society – <http://www.irms.org.uk/> – has an illustrious history!

Comments on the specific Principles as drafted:

Principle 1 – Getting it right

This could perhaps be a place to introduce the notions of Quality Management, Professionalism and Learning and Development.

Principle 2 – Being customer focused

It was felt that the top section of this Principle should be more proactive – there should be greater emphasis about seeking out customer needs rather than just simply responding to them, seeking and responding to feedback and following up to check whether something has worked or not.

It must also be made clear on how to access services, with access routes that are appropriate for different types of customer – e.g. ensuring there is an easy to use phone line for elderly people, availability of translation facilities, and guidance for those citizens with literacy issues.

Also a requirement is needed that a person who has a clear “point of ownership” for all enquiries with a duty to ensure a response in a reasonable time could either be in here or Principle 3.

Principle 3 – Being open and accountable

A requirement to have clearly stated and published decision criteria – so that people can see in advance how decisions are made. These should be reviewed regularly and people informed when they are changed. This should reinforce public confidence if it can be clearly demonstrated that the relevant Authority is actually open and accountable.

Principle 4 – Acting fairly and proportionately

No specific comment beyond what has already been written.

Principle 5 – Putting things right

There should be a greater emphasis on learning from past mistakes. We have to accept that sometimes mistakes happen. While there is a duty to seek to minimise errors in decision making and service delivery, including early detection, acknowledgement and regular review to systematically eliminate causes of errors, this process should be built in to the Authority’s core management functions.

Principle 6 – Seeking continuous improvement

This is really important – see Quality above – but it is drafted in a style which might to some readers seem to reflect an approach that one member described as “a bit tick boxy”.

We would like to see much more emphasis on an Authority’s obligation to have a demonstrable system that includes proactively monitoring results, checking impacts, seeking feedback, looking at others’ experience and seeking ways to do things better and that this information on how this obligation is delivered is readily accessible to any citizen.

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Pembrokeshire Coast National Park Authority
Brecon Beacons National Park Authority**

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