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Information and documentation — Management systems for records — Guidelines for implementation

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Foreword

ISO (the International Organization for Standardization) is a worldwide federation of national standards bodies (ISO member bodies). The work of preparing International Standards is normally carried out through ISO technical committees. Each member body interested in a subject for which a technical committee has been established has the right to be represented on that committee. International organizations, governmental and non-governmental, in liaison with ISO, also take part in the work. ISO collaborates closely with the International Electrotechnical Commission (IEC) on all matters of electrotechnical standardization.

The procedures used to develop this document and those intended for its further maintenance are described in the ISO/IEC Directives, Part 1. In particular the different approval criteria needed for the different types of ISO documents should be noted. This document was drafted in accordance with the editorial rules of the ISO/IEC Directives, Part 2 (see www.iso.org/directives).

Attention is drawn to the possibility that some of the elements of this document may be the subject of patent rights. ISO shall not be held responsible for identifying any or all such patent rights. Details of any patent rights identified during the development of the document will be in the Introduction and/or on the ISO list of patent declarations received (see www.iso.org/patents).

Any trade name used in this document is information given for the convenience of users and does not constitute an endorsement.

For an explanation on the meaning of ISO specific terms and expressions related to conformity assessment, as well as information about ISO's adherence to the WTO principles in the Technical Barriers to Trade (TBT) see the following URL: Foreword - Supplementary information

The committee responsible for this document is ISO/TC 46, *Information and documentation*, Subcommittee SC 11, *Archives/records management*.

Introduction

ISO 30302 is part of a series of International Standards, under the general title *Information and documentation — Management systems for records*:

— ISO 30300, *Information and documentation — Management systems for records — Fundamentals and vocabulary*

— ISO 30301, *Information and documentation — Management systems for records — Requirements*

— ISO 30302, *Information and documentation — Management systems for records — Guidelines for implementation*

ISO 30300 specifies the terminology for the Management systems for records (MSR) series of standards and the objectives and benefits of a MSR; ISO 30301 specifies the requirements for a MSR where an organization needs to demonstrate its ability to create and control records from its business activities for as long as they are required; ISO 30302 provides guidance for the implementation of a MSR.

The purpose of this International Standard is to provide practical guidance on how to implement a management system for records (MSR) within an organization in accordance with ISO 30301. This International Standard covers what is needed to establish and maintain a MSR.

The implementation of a MSR is generally executed as a project. A MSR can be implemented in organizations with existing records systems or programmes to review and improve the management of those systems or programmes or in organizations planning to implement a systematic and verifiable approach to records creation and control for the first time. Guidance described in this International Standard can be used in both situations.

It is assumed that organizations that decide to implement a MSR have made a preliminary assessment of their existing records and records systems and have identified risks to be addressed and opportunities for major improvements. For example, the decision to implement a MSR can be taken as a risk-reduction measure for undertaking a major information technology platform change or outsourcing business processes identified as high risk. Alternatively, the MSR can provide a standardized management framework for major improvements such as integrating records processes with specific business processes or improving control and management of records of online transactions or business use of social media.

The use of this guidance is necessarily flexible. It depends on the size, nature and complexity of the organization and the level of maturity of the MSR if one is already in place. Each organization's context and complexity is unique and its specific contextual requirements will drive the MSR implementation. Smaller organizations will find that the activities described in this International Standard can be simplified. Large or complex organizations might find that a layered management system is needed to implement and manage the activities in this International Standard effectively.

Guidance in this International Standard follows the same structure as ISO 30301, describing the activities to be undertaken to meet the requirements of ISO 30301 and how to document those activities.

Clause 4 deals with how to perform the analysis needed to implement a MSR. From this analysis, the scope of the MSR is defined and the relationship between implementing a MSR and other management systems is identified.

Clause 5 explains how to gain the commitment of top management. The commitment is expressed in a records policy, the assignment of responsibilities, planning the implementation of the MSR and adopting records objectives.

Clause 6 deals with planning, which is informed by high-level risk analysis, the contextual analysis (see Clause 4), and the resources available (see Clause 7). Clause 7 outlines the support needed for the MSR, such as resources, competence, training and communication, and documentation.

Clause 8 deals with defining or reviewing and planning the records processes to be implemented. It draws on the contextual requirements and scope (see Clause 4) and is based on the records policy (see 5.2), the risk analysis (see 6.1) and resources needed (see 7.1) to meet the records objectives (see 6.2) in the planned implementation. Clause 8 explains what records processes and systems need to be implemented for a MSR.

Clauses 9 and 10 deal with performance evaluation and improvement against planning, objectives and requirements defined in ISO 30301.

For each of ISO 30301:2011, Clauses 4 to 10 , this International Standard provides the following:

a) the activities necessary to meet the requirements of ISO 30301 – activities can be done sequentially, while some will need to be done simultaneously using the same contextual analysis;

b) inputs to the activities – these are the starting points and can be outputs from previous activities;

c) outputs of the activities – these are the results or deliverables on completion of the activities.

This International Standard is intended to be used by those responsible for leading the implementation and maintenance of the MSR. It can also help top management in making decisions on the establishment, scope and implementation of management systems in their organization. It is to be used by people responsible for leading the implementation and maintenance of the MSR. The concepts of how to design the operational records processes are based on the principles established by ISO 15489-1. Other International Standards and Technical Reports developed by ISO/TC 46/SC 11 are the principal tools for designing, implementing, monitoring and improving records processes, controls and systems, and can be used in conjunction with this International Standard for implementing the detailed operational elements of the MSR.

Organizations that have already implemented ISO 15489-1 can use this International Standard to develop an organizational infrastructure for managing records under the systematic and verifiable approach of the MSR.

Information and documentation — Management systems for records — Guidelines for implementation

1 Scope

This International Standard gives guidance for the implementation of a MSR in accordance with ISO 30301. This International Standard is intended to be used in conjunction with ISO 30300 and ISO 30301. This International Standard does not modify and/or reduce the requirements specified in ISO 30301. It describes the activities to be undertaken when designing and implementing a MSR.

This International Standard is intended to be used by any organization implementing a MSR. It is applicable to all types of organization (e.g. commercial enterprises, government agencies, non-profit organizations) of all sizes.

2 Normative references

The following documents, in whole or in part, are normatively referenced in this document and are indispensable for its application. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

ISO 30300, *Information and documentation — Management systems for records — Fundamentals and vocabulary*

ISO 30301:2011, *Information and documentation — Management systems for records — Requirements*

3 Terms and definitions

For the purposes of this document, the terms and definitions given in ISO 30300 apply.

4 Context of the organization

4.1 Understanding of the organization and its context

The context of the organization should determine and drive the implementation and improvement of a MSR. The requirements of this Clause are intended to ensure the organization has considered its context and needs as part of the implementation of a MSR. These requirements are met by analysing the organization's context. This analysis should be performed as the first step of the implementation to

a) identify internal and external factors (see 4.1),

b) identify business, legal and other requirements (see 4.2), and

c) define the scope of the MSR (see 4.3) and identify risks (see Clause 6).

NOTE 1 When the scope of the MSR is stated by top management at the starting point, before identifying factors and the need for records, the extent of the contextual analysis is defined by the scope as stated.

NOTE 2 This MSS approach for context analysis and identification of requirements is compatible with the analysis process (appraisal) proposed by ISO 15489-1 which also includes elements of planning (see Clause 6) and identification of needs of records (see Clause 8).

Contextual information needs to be from a reliable source, accurate, up to date and complete. Regular review of the sources of this information ensures the accuracy and reliability of the contextual analysis.

A.1 provides examples of sources of information about the organization's internal and external context and examples of potential stakeholders.

In identifying how the context affects the MSR, examples of important factors can be

1) how a competitive market affects the need to demonstrate efficient processes,

2) how external stakeholders' values or perceptions affect records retention decisions or information access decisions,

3) how the information technology infrastructure and information architecture can affect the availability of records systems or records,

4) how the skills and competencies within the organization can affect the need for training or external assistance,

5) how legislative instruments, policies, standards and codes affect the design of records processes and controls,

6) how the organizational culture can affect compliance with the requirements of the MSR, and

7) how the complexity of the organization's structure, business and legislative environment will affect records policy, processes and controls (e.g. in a multi-jurisdictional environment).

Depending on the organization, the identification of internal and external factors may have been performed for other purposes, including the implementation of other management system standards. In such cases, a new analysis may not be needed and an adaptation will suffice.

The contextual analysis is a continual process. It informs the establishment and systematic evaluation of the MSR (see Clause 9) and supports the cycle of continuous improvement (see Clause 10).

Output

Documented evidence that the analysis has been undertaken is a requirement of ISO 30301. Examples are as follows:

— a list of internal and external factors to take into account;

— a chapter in a manual or project plan for implementing a MSR;

— a formal report on the analysis of the organization's internal and external context and how it affects and is affected by the MSR;

— a series of documents about the context of the organization.

4.2 Business, legal and other requirements

Using the result of the analysis described in 4.1 as the starting point, the legal, business and other requirements are assessed in relation to the business activities and documented. The business activities are the first elements that are analysed to identify the requirements that affect records creation and control.

Identifying business requirements should take the following into account:

a) the nature of the activities of the organization (e.g. mining, financial advice, providing public services, manufacturing, pharmaceutical, personal services, non-profit, community services);

b) the particular form or ownership of the organization (e.g. a trust, company or government organization);

c) the particular sector to which the organization belongs (i.e. public or private sector, non-profit);

d) the jurisdiction(s) in which the organization operates.

Business requirements should be identified from the performance of current business processes and also from the perspective of future planning and development. Special attention is needed when the organization is implementing automated or digital business processes. In these cases, requirements can change and need to be discussed with the people responsible for the development and implementation of the proposed new processes.

Activities to determine all the mandatory legal and regulatory instruments applicable to the organization include the following:

1) reviewing compliance requirements for sector-related legislation;

2) reviewing compliance for privacy and other records/data management legislation.

A.2 provides examples of the business, legal and other requirements relating to the creation and control of records and for sources of expert assistance in identifying business, legal and other requirements.

Output

Documentation of the identification of the business, legal and other requirements is mandatory in order to comply with ISO 30301. Requirements can be documented all together or in separate documents by type of requirement. Examples of the kind of documentation are as follows:

— a list of requirements identified by type (e.g. business, legislative);

— a chapter in a manual or project plan for implementing a MSR;

— A formal report on identification of requirements for the MSR;

— a list of all laws and other codified regulatory or mandatory instruments that apply to the organization relating to the creation and control of records;

— a Precedents Profile (a set of legal precedents on particular subject matters relevant to the organization).

4.3 Defining the scope of the MSR

The scope of the MSR is a decision made by top management and clearly outlines the boundaries, inclusions, exclusions, roles and relationships of the component parts of the MSR.

The scope can be defined as a result of the contextual analysis, taking into account identified factors (see 4.1) and requirements (see 4.2) but also can be stated by top management from the starting point before identifying factors and requirements.

The scope includes the following:

a) identification of what parts or functions of the organization are included. It can be the whole organization, an area or department, a specific function or business process or a group of them;

b) identification of what parts or functions of other (related) organizations are included and the relationships between them;

c) description of how the MSR integrates with the overall management system and with other specific management systems implemented by the organization (e.g. ISO 9000, ISO 14000 and ISO/IEC 27000);

d) identification of any processes that affect the MSR that are outsourced and the controls for the entities responsible for the outsourced process.

Output

A documented statement defining the scope of the MSR is a requirement of the MSR. This statement can be a single document or be included in other MSR documents such as the records policy (see 5.2) or in manuals or project plans to implement the MSR.

5 Leadership

5.1 Management commitment

The commitment of top management to implementing the MSR is stated as explicitly and at the same level of detail as for any other management systems implemented by the organization and as for its other assets, e.g. human resources, finances and infrastructure. The requirement to demonstrate top management commitment does not require a specific activity to be performed but is essential for the success of the MSR. Commitment is also implicit in other requirements of ISO 30301 relating to resources (see 7.1), communication (see 7.4) and management review (see 9.3).

Output

It is not mandatory to document top management's commitment to the MSR, except in the records policy (see 5.2), which can be considered as evidence of that commitment. Commitment can also be demonstrated by actions or statements but depending on the nature and complexity of the organization, evidence of commitment should be documented in addition to the records policy. Examples can be found in the following:

— minutes of Boards of Directors or Boards of Management;

— statements in strategic and business plans;

— management resolutions and directives;

— budgets, business cases;

— communication plans.

5.2 Policy

The strategic direction of the organization, as defined by top management, is the basis for the records policy. The records policy is established by top management as the driver for implementing and improving an organization's MSR and providing the benchmark for assessing the performance of the MSR.

Directions from top management need to be stated in a formal document. The document is not normally drafted by top management but requires top management's formal approval, independent of the authors. Depending on the organization, top management can be identified by different positions but the records policy should be endorsed by the person in the position recognized as the most senior.

The records policy contains the overall direction on how records creation and control meet the organizational goals and provides the principles for action. It can be integrated into an overarching management policy where more than one management systems standard are implemented. In this case, the records policy does not require separate management endorsement.

Inputs to the records policy include the following:

a) analysis of the organizational context and identification of the requirements (see 4.1 to 4.2);

b) organizational goals and strategies;

c) influence of, or relationship of the policy to other organizational policies;

d) scope of the MSR (see 4.3);

e) organizational structure and delegations.

The records policy is a statement of intent and includes, for example,

1) purpose,

2) high-level directions for the creation and control of records,

3) high-level responsibilities or commitment for the creation and control of records,

4) indication of how the policy is to be implemented, and

5) definitions.

The records policy should be drafted in a form that all people affected by the MSR can readily understand. In the implementation of records processes and systems, some technical documents including decisions are called policies. When implementing ISO 30301, the records policy should be unique and short document as a declaration from top management and does not include a description of objectives, actions or records processes.

To communicate records policy, the organization can use the methods in 7.4.

Output

An authorized records policy is required as a formal document when implementing a MSR. This formal document should be controlled and distributed throughout the organization. The records policy is the overarching document for all other documents developed for the implementation of a MSR.

5.3 Organizational roles, responsibilities and authorities

5.3.1 General

MSR responsibilities and authorities are defined and assigned to appropriate roles. They are communicated at all levels of the organization so that it is clear who is responsible for taking the necessary action for the design, implementation and maintenance of the MSR. Apart from the formal appointment of the management and operational representatives outlined in the following clauses, to implement a MSR, top management should assign responsibilities for

a) policy development and approval,

b) resource allocation,

c) development of procedures and processes and their approvals,

d) systems design,

e) training and guidance,

f) implementation and maintenance of policy, procedures and processes,

g) audit/monitoring of compliance, and

h) performance management.

These responsibilities can be assigned to different roles in the organization. The following statements can be used as guidelines for the assignment of responsibilities.

1) Top management is responsible for authorizing and supporting the application of the records policy throughout the organization.

2) Leadership responsibility and accountability for the MSR is assigned to (a specific role) within top management.

3) Business unit managers are responsible for ensuring that employees in their units create and manage records in accordance with the records policy.

4) Records professionals are responsible for the design of records processes and controls, the implementation and maintenance of records systems, and for training of persons in records processes and controls and in the use of records systems, as they affect individual practices.

5) Systems administrators are responsible for ensuring that records systems are reliable, secure, compliant, comprehensive and manage records in a systematic manner, including during migration and changes.

6) Information technology employees are responsible for implementing and maintaining the technological aspects required for managing records on a continuous and reliable basis including the migration of systems when needed.

7) All employees are responsible and accountable for creating and managing records of their activities according to the records policy, through use of the organization's records systems, processes and controls.

Requirements in this Clause are closely related to requirements in 7.2 and 7.3 and should be implemented at the same time.

Output

Assignment of responsibilities is part of the documented information required when implementing a MSR. It can be documented in different forms. The following are some examples:

— high-level responsibilities reflected in the records policy (see 5.2);

— documentation of the appointment of the management representative and the operational representative;

— job descriptions or similar statements;

— formal delegations of responsibilities;

— a chapter in a manual or project plan relating to responsibilities for implementing a MSR.

5.3.2 Management responsibilities

The role and responsibilities of the management representative are assigned and clearly defined. This role has overall responsibility for leading the implementation and maintenance of the MSR. The management representative should be part of the top management of the organization. Depending on the complexity of the organization and the MSR to be implemented, leadership should be complemented by an operational representative (as defined in 5.3.3).

Responsibilities of the top management representative should include the following:

a) approving the formal documentation of planning, design, maintenance and evaluation of the MSR and MSR projects, where required;

b) approving the allocation of resources necessary to implement and maintain the MSR;

c) approving the assignment of one or more roles to implement and maintain the MSR. Roles can be assigned to a specific position or to a designated group as appropriate to the complexity and size of the organization;

d) promoting compliant MSR behaviour through methods such as communication (see 7.4) and employee participation, empowerment, motivation, recognition and rewards;

e) defining competencies required for persons (employees or contractors) assigned roles in implementing and maintaining the MSR.

The scope, nature and documentation of responsibilities are outlined in 5.3.1.

Output

— As for 5.3.1.

5.3.3 Operational responsibilities

An operational representative is assigned responsibility for designing and directing the activities required for the operational implementation of, and reporting to top management on the MSR. The operational representative can be an employee or a contractor.

The operational representative should have specific records competencies as defined in 7.2.

The scope, nature and documentation of responsibilities are outlined in 5.3.1.

Tasks to be directed by the operational representative are based mainly on those identified in ISO 30301:2011, Clause 8 and Annex A.

An operational representative can coordinate the activities of one or more MSR teams to implement and maintain the MSR at the operational level and undertake performance improvements.

The operational representative should provide reports, with supporting documentation, to top management or the management representative on the implementation and effectiveness of the MSR and recommendations for process-related improvements. Reports can be delivered at regular scheduled intervals, or stages, according to the organization's requirements. Reports are records and should be managed in accordance with the records processes and controls in ISO 30301:2011, Annex A.

Liaison with external parties on MSR matters are also part of the operational representative's responsibilities. They can include, but are not limited to

a) seeking advice from legal and regulatory experts,

b) complying with the requirements or directions of audit and quality control specialists,

c) directing and negotiating with suppliers of products or services (e.g. software suppliers, implementation consultants), and

d) acquiring additional skills and assistance from human resources or information technology contractors.

The roles of the management representative and operational representative can be performed by the same person or group depending on the complexity and size of the organization and the scope of the MSR.

Output

— As for 5.3.1.

6 Planning

6.1 Actions to address risks and opportunities

This Clause focuses on planning around the strategic risks associated with ensuring the MSR achieves its intended outcome. Successful implementation of a MSR requires risks to be identified, analysed and evaluated as part of planning for the MSR implementation. The analysis of factors (see 4.1) and requirements (see 4.2) should be completed in conjunction with a risk assessment. This is used to define the records objectives (see 6.2) and identify what actions are needed to achieve those objectives. These actions are incorporated into MSR processes (see Clause 8).

Establishing a MSR assists organizations to manage the effect of uncertainty on its business objectives. Failing to create and keep adequate records can create business uncertainty and have a negative

impact on the ability to achieve organizational objectives. Establishing a MSR assists organizations in managing that uncertainty and impact. In this sense, a MSR is a risk treatment. The strategic opportunities associated with a MSR can be considered as the positives or the strengths underpinning the implementation of the management system. These may be associated with increasing organizational transparency and accountability, improving business processes, cost effectiveness and efficiency, and strengthening stakeholder and client relationships. A MSR may provide the opportunity to correct areas of weakness in practices and protect against business threats brought about by changes to the external operating environment or context. Identification, analysis and evaluation of this kind of risks and opportunities are normally done before the decision to implement a MSR as part of a general risk management framework.

When implementing a MSR, uncertainties in regard to achieving objectives need to be identified as risks. This risk assessment can also provide opportunities to improve business processes and have a positive influence on business objectives. The purpose of the requirements in this Clause is to address the assessment of those risks and opportunities relating to the objectives of a MSR. This is part of the planning of the MSR. Organizations can decide what kind of risk management methodology they are going to use and how the actions to mitigate risks are identified and put in place.

In addition, there are also risks related to the records themselves and the records systems in which they reside. These are operational risks, and as such, should be assessed during operational planning (see 8.1).

Depending on the nature of the risks and opportunities, different types and levels of treatments and actions are needed. The key determining factor is whether the risks and opportunities are related to objectives of the MSR or operational in nature. While the requirements for both are in different clauses of ISO 30301, they can be addressed as a single activity.

Where an organization has established a formal risk management framework, planning for the MSR should be included in the risk identification, analysis and evaluation process of that framework.

Areas of uncertainty which could pose risks need to be considered in the strategic planning for a MSR. They can include the following:

a) contextual change, such as legal and regulatory change, change to the economic or political environment, structural change;

b) systems and processes involved in creating and controlling evidence to support the organization's achievement of its mission and goals;

c) human resources and skills to implement and maintain the MSR;

d) budgetary or financial implications and changes;

e) measurement and evaluation of achievement of policies, objectives and strategies;

f) relationships with other management systems already implemented.

Identification of strategic risks and opportunities and formulating records objectives can be mutually influential. Therefore, this is not to be treated as a linear sequence of actions.

The identification of risk at this level should be linked to the MSR in general, or to a specific objective. For example, risks related to "human resources and skills" mentioned above as an area of uncertainty may be related to the MSR itself or to a records objective.

With the MSR itself, a risk may be that managers misunderstand the management system's purpose and its potential impact on business processes and objectives and just focus on the certification processes associated with MSR implementation.

For example, if a records objective states the need for a specific system for capturing electronic records in customer-related processes, a risk is that employees will be resistant to change and will use alternative technologies (e.g. keeping records of business decisions in email applications instead of using the designated system for keeping those records).

Actions to address risks and opportunities are specific for each organization. They are also specific to each risk or opportunity identified. They should be included in actions to achieve objectives and in the design of records processes.

Output

There is no specific requirement to document this aspect of the planning process. The risk approach can be included in plans to achieve objectives (see 6.2) or be documented as a separate part of the planning. Examples are

— any output of applying risk assessment tools (IEC 31010, Annex B includes a range of such tools and ISO/TR 18128 includes some examples), and

— documentation of actions to be taken to address risks and opportunities.

6.2 Records objectives and plans to achieve them

Objectives of the implementation of a MSR, or records objectives, are defined according to the organization's context, requirements and priorities. The actions to achieve them are identified and the objectives and plan are communicated throughout the organization in accordance with the scope of the MSR.

Inputs to the definition of the records objectives include

a) the analysis of the organization's context and identification of requirements (see Clause 4),

b) the records policy (see 5.2),

c) the risk analysis and actions and priority areas identified to address those risks (see 6.1), and

d) review of existing records processes.

Records objectives are specific to the organization [informed by the contextual analysis (see Clause 4) and risk analysis (see 6.1)], aligned with its strategies and goals, and able to be measured.

In defining records objectives, the organization should take in account the adequacy of the existing records and records systems as reviewed, the risks identified as having priority for treatment, and the key areas for improvement from which the organization can gain most benefit.

Changes in the organizational context (e.g. legislative changes), in the records policy, in risk assessments or outcomes of performance evaluation, require review of the records objectives to update or modify if necessary. Records objectives should be communicated using the methods in 7.4.

Actions to achieve the records objectives are to be identified. Each objective can be related to one or more actions. Actions identified need to be planned by

1) defining what outcomes are expected from the actions,

2) identifying where, when, how and by whom the actions are or should be undertaken,

3) Depending on the organization's needs, context, size and complexity, and the nature of the action to be taken, actions to achieve the records objectives can be planned using a formal project management methodology or more informal documented project or action plans. This can result in one or more project plans depending on the size and complexity of the actions.

The control of planned changes can be done by formal project reporting, a change request process within planning and monitoring, or redesign of procedures.

The planning process can be articulated by a business case that includes the priorities and objectives to implement a MSR. This would include

i) the scope of the MSR (see 4.3),

ii) risks to be addressed by the MSR,

iii) objectives and plans,

iv) priorities and timelines for specified tasks for achievement of objectives,

v) responsibilities to be assigned to specific individuals,

vi) project dependencies,

vii) requirements for additional human resources and skills,

viii) requirements for other resources, and

ix) methods for evaluating the results of action taken.

The planning phase enables the organization to understand the relevance of a MSR and clarifies the roles and responsibilities within the organization needed for a MSR project.

Output

Creation of documented information about records objectives is a requirement of the MSR but no mandatory form or document is required to be produced. Examples include the following:

— a specific records objectives document;

— documented management approval of, and commitment to implement a MSR;

— a business case or equivalent;

— one or more MSR project plans with key milestones.

7 Support

7.1 Resources

Planning for the implementation and maintenance of the MSR (see Clause 6) includes assessing the type and quantity of resources needed, followed by obtaining management commitment to the allocation of those resources for as long as needed.

Resources can be allocated for different periods depending on the scope of activities to be undertaken and to ensure that maintenance of the MSR becomes part of regular business processes. Resources can be temporary or permanent, external or internal.

Resources required for designing, implementing and maintaining a MSR can include the following:

a) human resources – appropriate numbers, levels and skills;

b) an ICT environment appropriate to the organization's need for records processes and controls;

c) financial resources;

d) facilities and logistics, e.g. to accommodate additional employees (if needed).

Formal arrangements should be established for persons and organizations that supply and contract their services to the organization in relation to designing, implementing and maintaining the MSR. Such arrangements can include the following:

— definition of responsibilities;

— requirements for specific competencies;

— sustainability of supply of the services;

— transition arrangements on the conclusion of the supplier contract period.

Output

Allocation of resources is part of the top management commitment but there is no specific requirement to keep specific documented information. Typical documents where resource allocation can be demonstrated are budgets, organization charts, statement of division of responsibilities, inventory of systems, facilities and other infrastructure required for the MSR, and contracts (e.g. for externally provided services).

7.2 Competence

Persons need to be competent to perform their assigned roles in the MSR. This requires defining what competencies are required, acquiring employees or contractors with the appropriate competence and ensuring that competencies remain appropriate to the roles.

The competencies required for the operational roles will vary depending on the size and complexity of the organization, the roles and activities to be undertaken.

Competencies typically required for the records operational representative can include the following:

a) qualifications in an area of information management;

b) managing projects including project planning, monitoring and reporting;

c) managing employees, contractors and teams;

d) developing techniques for stakeholder engagement;

e) evaluating organizational performance in a specific area and developing recommendations for change or improvements.

The competencies required from persons responsible for designing and implementing records processes and controls will be defined at different levels depending on their role. Typical areas of competency include the following:

1) contextual and requirements analysis;

2) establishing procedures, tools and methods for records control and maintenance;

3) developing and implementing access rules;

4) designing and implementing systems to support records processes;

5) determining records disposition procedures, rules and implementing disposition;

6) maintaining records systems.

The competency criteria applies to the organization's employees and any contract or temporary employees working on behalf of the organization.

After determining what skills are required for implementing a MSR, records processes and systems, statements of responsibility or job descriptions which include competencies can be developed. Evaluating the experience, qualifications and skills of current employees against the statements of responsibility or job descriptions allows gaps to be assessed and actions taken to fulfil competencies. This can result in

i) training or mentoring of existing employees,

ii) reassigning employees,

iii) hiring new employees, and

iv) acquiring contract employees.

The actions taken to acquire the necessary competence can be evaluated by

— individual performance assessments against agreed benchmarks, and

— results of the performance evaluation of the MSR (see Clause 9).

Output

Evidence of the competence of persons assigned to different roles is required by ISO 30301. Mandatory outputs are employee records demonstrating skills, education or training, and a definition of skills and competences for each position.

7.3 Awareness and training

Strategies are required for building awareness of the MSR policy, objectives and requirements, and for employees to understand their roles and responsibilities for achieving conformity with the MSR. This is done through various training and awareness programs and methods and can be incorporated into existing programs.

Strategies for training and awareness can include the following:

a) introductory programs for employees;

b) formal, structured training programs;

c) management and employee briefings, for example, as part of regular employee meetings;

d) financial or in-kind recognition or rewards;

e) refresher training in specific aspects of the MSR and the operational aspects of records processes and controls;

f) communication techniques listed in 7.4;

Training can be delivered in various ways to suit the needs of the organization and can include the following:

1) face-to-face training;

2) online training;

3) one-on-one training, e.g. for management.

Output

There is no requirement for specific documented information of the implementation of requirements in this Clause. The implementation of a training program can be demonstrated in a various ways. The following are examples of outputs and will vary depending on the size and complexity of the organization, and the subject matter of the training and awareness program:

— program design concept;

— instructional plan;

— administrative plan;

— program evaluation plan;

— program content;

— training materials, including instructor's notes and participant materials;

— program evaluation;

— records of attendance.

7.4 Communication

Communication procedures and methods are developed to ensure the effective implementation of, and compliance with, the requirements of the MSR. In developing such procedures and methods, it is important to identify the various target groups or audiences. Different messages and methods of communication may be required for different audiences. Communication about the MSR can be incorporated into existing communication strategies.

Procedures for communication about the MSR should include the following:

a) scope of communication and summary of content;

b) methods of communication;

c) responsibilities for communication;

d) methods for assessing the effectiveness of communication.

The content of communication about the MSR should include the following:

1) the aim of the MSR;

2) the benefits of implementing a MSR;

3) roles and responsibilities;

4) the location of, and access to documentation about the MSR, including operational elements;

5) the content of operational procedures relating to records processes, controls and systems;

6) sources of assistance in complying with the records policy, objectives and operational elements (e.g. records system support services).

Examples of methods of internal communication include the following:

— promotional activities such as intranet notices, posters, competitions and prizes;

— floorwalkers, i.e. business champions promoting the MSR message;

— briefings at regular business unit meetings;

— newsletters and bulletin boards.

The organization needs to decide whether or not to communicate with external stakeholders about the MSR, the records policy and objectives. This requires a good understanding of who are the external stakeholders, the nature of their interest in the organization, and their actual or potential effect on the implementation and sustainability of the MSR (see 4.1).

For example, it can be important to communicate with entities that are part of the organization's supply chain to enable consistent and sustainable outcomes for records processes and controls within the MSR or, where there are shared business processes, another entity or entities can require direct access to some of the organization's records systems.

The organization can choose how it documents the communication with other entities about the records policy, objectives and operational procedures, depending on the relationship and the entities' effect on, or input to the MSR. However, where external entities interact with the organization's routine business processes, communication should cover the respective roles, rights and conditions for the affected records processes and controls and use of records systems.

Output

A documented procedure on internal communication is mandatory when implementing ISO 30301. If the organization decides to communicate about the MSR externally, an external communication procedure or including both internal and external messages in a general communication procedure is needed.

Additional outputs of the implementation of this requirement are the messages, results or evidence of the communication and the documented decision to communicate or not to external stakeholders about the decision to establish a MSR.

7.5 Documentation

7.5.1 General

Documentation is established and maintained to describe the core elements of the MSR and their interrelationships. It includes definition of the structure, format, elements and control system(s) for documentation describing the MSR and arising from MSR processes and controls.

Documentation of the planning, operation and control of the MSR processes is dependent on the size of the organization and the scope of the MSR. ISO 30301 establishes the minimum documentation required for implementing a MSR but organizations can produce additional documentation, if necessary, to ensure effective planning, operation and control of the MSR.

The required documentation to implement ISO 30301 is identified and explained in each clause. Specific documents such as policy or procedures are identified as requirements. Other documentation requirements are stated without defining a specific type of document, so can be met in different ways.

ISO 30301:2011, 7.5.1 can be used to check the documentation requirements of other clauses. Table 1 shows documentation required in other clauses.

Table 1 — Documentation requirements

Documentation requirement	ISO 30301 Clause	Specified document
External and internal factors	4.1	Not specified
Business, legal, and other requirements	4.2	Not specified
Scope of the MSR	4.3	Not specified
Interdependence and relationships between the MSR and the other management systems	4.3	Not specified
Records policy	5.2	Policy
Roles and responsibilities	5.3	Not specified
Risk assessment	6.1	Not specified
Records objectives and planning	6.2	Not specified
Competence needed	7.2	Not specified
Internal communication	7.4	Procedure
External communication (conditional)	7.4	Procedure
Documentation control	7.5.2	Procedure
Records processes design	8.1	Not specified
Records processes control	8.1	Not specified
Performance evaluation	9.1	Not specified
Internal audit	9.2	Audit programme
Nonconformities and corrective actions	10.1	Not specified

Table 1 *(continued)*

Documentation requirement	ISO 30301 Clause	Specified document
Records identification	A.1.1	Not specified
Requirements for records	A.1.1, A.1.2, A.1.3, A.2.1	Not specified
Records retention	A.1.1	Procedure Disposition schedule
Records capture methods	A.1.1	Not specified
Records point of capture	A.1.2.2	Work process procedure
Technology selection or change	A.1.4	Not specified
Register (conditional)	A.2.1	Procedure
Classification	A.2.1	Classification schema
Event history	A.2.1	Procedure
Access	A.2.2	Access rules
Integrity, authenticity, usability	A.2.3	Procedure
Disposition	A.2.4	Procedure
Transfer and remove	A.2.4	Procedure
Records systems	A.2.5.1	Inventory of records systems
Implementing decisions on records systems	A.2.5.2	Not specified
Availability and integrity of records systems	A.2.5.4 and A.2.5.6	Procedure

7.5.2 Control of documentation

A procedure is established and maintained to control the documentation of the MSR.

The procedure should establish the different levels of documentation, conventions for naming and coding the documentation and the roles and responsibilities for drafting, reviewing and approving documentation. Forms or templates can be established for any kind of documentation.

Documentation required by the MSR (see 7.5.1) and arising from the design, implementation and maintenance of records processes and controls are managed using the records processes and controls in ISO 30301, Annex A.

In addition to records controls, documentation is updated with version controls and should follow the communication and distribution procedures established in 7.4.

International Standards and Technical Reports of ISO/TC 46/SC 11 contain additional sources of guidance on designing and implementing a range of records processes and controls.

When the organization has implemented other management systems standards (MSS), documentation should be aligned and documentation procedures should be common to the two or more MSS.

Output

— Control of documentation procedure.

8 Operation

8.1 Operational planning and control

Organizations define, plan and implement the operational records processes and systems to meet the records objectives (see 6.2), which include actions to address the risks and opportunities identified in 6.1.

Most organizations implementing the MSR will have existing records, records processes and records systems which should be reviewed using the MSR's procedures described below and assessed against the records processes and controls described in ISO 30301, Annex A. Review of existing records, records processes and records systems also contributes to determining records objectives and operational planning and control.

The operational records processes and systems needed are defined and planned. The organization plans the operation of the MSR by defining the records processes and systems to be implemented, defining the criteria for performing the processes, and describing (at the level of detail needed) the different activities, outcomes, people and systems involved. When defining the records processes, it is necessary to identify what kinds of controls are needed to demonstrate that each process is implemented as planned. Inputs to operational planning and control are the analysis of the risks and opportunities and the actions to be taken to address those risks and opportunities (see 6.1).

The operational processes to create and control records according to the organization's specific needs are implemented to meet the requirements of ISO 30301, Annex A. Relevant International Standards and Technical Reports of ISO/TC 46/SC 11 can be used as guidance for the design and implementation of these processes. Requirements in this Clause should be considered together with requirements in 8.2 and 8.3.

When any business process or records processes are outsourced, ISO 30301 explicitly requires a control over such processes. The controls should be specified and documented in contracts with the outsourced providers.

The processes undertaken by outsourced providers are subject to the same performance evaluation as any other processes of the MSR in accordance with Clause 9.

Output

There is no specific output for this Clause. Outcomes are included in 8.2.

8.2 Design of records processes

The design of records processes and controls involves review of existing records processes or design of new records processes. Both review and design of new processes are based on an analysis of the organization's work processes and designed to meet the records objectives. The design of records processes and the technology to be used will vary in scope and complexity depending on the contextual analysis, the risk assessment, the requirements of the business processes, the size and nature of the organization (see 4.1 and 4.2) and the criticality of the business activities they support.

As well as risks and opportunities identified at the MSR level, the assessment and treatment of risk to the records processes should be included in the analysis supporting the design of new or improved records processes.

In addition to requirements in ISO 30301, 8.1 for the design of records processes, it establishes a process of design that includes the following:

a) analysis of work processes as the basis for the design of records processes. Work processes are analysed to determine the need for records (ISO 30301, Annex A) and to understand how to implement records creation and control requirements, which are defined in Annex A. ISO/TR 26122 provides guidance on undertaking an analysis of work processes;

b) assessment of risks arising from the operation of records processes and how they affect the creation of authentic, reliable and useable records of the organization's business processes. ISO/TR 18128 provides guidance on assessing risks relating to records processes.

The requirements for designing and implementing records processes established by ISO 30301 are listed in Annex A. ISO 15489-1 provides further guidelines on characteristics of records processes and key concepts for their implementation.

The controls in ISO 30301, Annex A should be used to show that the records processes, as designed, are appropriate to the business processes.

Compliance with the requirements in ISO 30301, Annex A does not mean records processes have to be implemented in the same way in each organization.

When records processes, linked with specific requirements mandated in ISO 30301, Annex A, are not suitable for an organization, it is not mandatory to implement all the processes and to comply with the associated requirements. However, the reasons justifying the decision should be identified and documented, as part of the design of records processes.

For records processes that are contracted-out or outsourced, controls should be established that can be included in contracts, service level agreements, reporting and documentation requirements.

To design records processes compliant with the requirements of ISO 30301, the following indicators can be used to determine that those requirements have been met. Points 1 to 4 are indicators relating to the creation and capture of records. Points 5 to 8 are indicators relating to the control processes, as outlined in ISO 30301, Annex A. Bracketed references relate to ISO 30301, Annex A.

Note International Standards and Technical Reports developed by ISO/TC 46/SC 11 provide the detailed guidance on undertaking the review and design of records processes and controls.

1) The organization has determined what, when and how records shall be created and captured for each business process (A.1.1).

   In accordance with the scope of the MSR, records objectives and implementation planning, the organization has established a systematic process to analyse the requirements to create and control records for each business process. This analysis can be performed as the organization determines but the results need to be documented. Examples of how this analysis could be undertaken and documented are

   i) flow diagrams of business processes indicating record creation points,

   ii) a list of documents for any business process, and

   iii) a broad description of records arising from business processes, documented in the procedures for each business process.

   From the same analysis, the organization has established retention periods for records. This is documented in a specific procedure which describes how this analysis is done. Disposition analysis procedure ensures that all legal, business and other requirements are taken into account and the appropriate persons approve the decisions taken. Results of the analysis are documented in disposition schedules linked to a specific business process or group of processes.

   Records creation processes can be designed by the organization using different approaches. Requirements in ISO 30301 establish the processes needed to ensure records are created at the time of the action/transaction that is being documented, by the appropriate person or instrument, and are captured by the most appropriate method. Methods to capture records are part of documented information.

2) The organization has determined the content, context and control information (metadata) that shall be included in the records (A.1.2).

   Records are captured along with descriptive and contextual information which allows them to be identified and understood by people other than the creator or by people outside the business processes. ISO 30301 does not define the information to be captured, except for the identification of the area of the organization responsible for the records. However, it is a requirement to document the points of capture of this descriptive information for each work process. This information can be included in the outcome of the analysis for each business process (A.1.1).

   Depending on the business sector, size and the complexity of the organization, the information to be captured can be predefined in metadata schemas. ISO 23081-2 provides guidance on metadata schemas for records.

   Where metadata schemas exist, this includes the control information referred to in ISO 30301, A.2.1.

3) The organization has decided in what form and structure the records shall be created and captured (A.1.3).

   Identification of records to be created (A.1.1) includes the form and structure of the records. This should be documented for each business process.

4) The organization has determined appropriate technologies for creating and capturing records (A.1.4).

   Identification of records to be created (A.1.1) includes decisions about the technologies to be used for creating and capturing records. This should be documented for each business process. In small organizations with a single function and small number of employees, the requirement can be met by documenting the decision to create records in paper or in computerized systems, and the selection of the computer application to be used.

5) The organization has determined what control information (metadata) shall be created through the records processes and how it will be linked to the records and managed over time (A.2.1).

   Designing the records processes necessary for the control and management of the records for as long as they are needed includes grouping records according to the work process to which they are related. To do this, an organization has a formal, documented scheme of grouping, named as classification scheme. Any change in business processes is reflected in the scheme.

   When necessary, a formal process of unique identification for each record is designed and a documented procedure is needed.

   The information created by these records processes is linked to the records as control information. The organization decides how to manage this control information, for example, using a predefined metadata schema.

   In small organizations, this requirement can be met by documenting the decision to create and keep the records in accumulations according to the broad business activity in the computer application selected, or in paper-based systems by the means of storage, and by documenting the relevant instructions to employees.

6) The organization has established rules and conditions for use of records over time (A.2.2).

   Defining the processes to access records requires analysing the use of the records and identifying the corresponding access or use permissions. Access rules are defined and documented including any mandatory regulation.

   Rules are implemented, defining people and their permissions to view or use records and implementing those rules into systems that keep records.

7) The organization has determined how to maintain the usability of the records over time (A.2.3).

   Usability of records over time is particularly important for digital records. Designing and implementing this process (for records in all formats) should cover security issues such as prevention of unauthorized use, modification, removal, concealment and/or destruction. For organizations implementing ISO/IEC 27001, security requirements can be already covered.

   ISO 30301 states requirements for a preservation process. This includes using relevant standards for media and technology and a procedure for periodically checking the maintenance of usability. Where encryption is used for security restrictions, time limits for the restriction and methods for de-encrypting records are determined and documented.

8) The organization has implemented authorized disposition of records (A.2.4).

   Designing processes for the disposition of records according to ISO 30301 includes establishing procedures to manage the disposition of the records including the attachment of retention periods to records, authorizing the decisions and implementing the disposition decisions. Disposition can include transfer to other organizations when needed, removing or changing storage locations and destruction. Destruction action is supervized and documented, and where needed, control information is kept about the records destroyed.

Output

— Records process design(s).

— Procedures for business processes incorporating records processes.

— Records control tools and supporting background analysis, e.g. procedures, classification scheme/s, metadata schemas, access rules, security model, disposition policy or authorities.

— System requirements and specification (for technology).

— Documentation of technology selection and acquisition.

— Documentation of system design and configuration.

— Reviews of processes, procedures and systems.

— Training materials.

8.3 Implementation of records systems

Requirements for the implementation of records systems are in ISO 30301, 8.3 and complemented with requirements in ISO 30301, A.2.5. Both should be understood as a whole.

Records systems compliant with the requirements of ISO 30301 can take a variety of forms. For example,

a) business applications or systems which retain and manage transaction records,

b) databases which re-create records as needed, and

c) specialized software used to automate the capture and management of records.

These systems can reside and be managed in-house or by an external provider. In either case, they should be capable of capturing, managing and providing access to records over time. They should also be capable of exporting records and their metadata in a way that they remain accessible, authentic, reliable and useable through any kind of system change.

ISO 15489-1 establishes generic characteristics of records systems and key concepts for their implementation. ISO 16175-1, ISO 16175-2, and ISO 16175-3 contain principles and functional requirements for records in electronic office environments and can be used to define requirements and select appropriate software. Other International Standards and Technical Reports developed

by ISO/TC 46/SC 11 should be used in the design implementation and maintenance of systems that keep records.

An organization can have more than one system that keeps records but it is a requirement to identify all systems that keep records and their responsible owners.

Regular monitoring of the performance of records systems against business requirements and records objectives should include ensuring that

1) records systems provide the functionality needed by business areas to perform their functions,

2) records systems operate according to their design specifications,

3) records systems are available to those who need them, when they need them,

4) records systems operate on a continuous and reliable basis and plans can be activated in the event of system or infrastructure failure, and

5) business continuity and disaster recovery plans include records systems.

Managing the operation of records systems means ensuring that those systems continue to operate on a reliable, secure, and compliant basis and cover the complete range of business activities of the organization. This can be done by

i) documenting and implementing procedures for system management and maintenance,

ii) regular testing of system conformance with the design specifications,

iii) analysing and taking corrective action arising from system failures, user problems and complaints,

iv) assessing the level of, and reasons for employees' use of other (non records) systems,

v) regular testing of system availability/accessibility and usability,

vi) testing system security,

vii) assessing systems against any changes in business requirements, stakeholder expectations or legislative requirements and making any changes necessary to meet these requirements, and

viii) taking the necessary action to enable the management of records of any new function or business process of the organization.

Output

Mandatory documented information includes the following:

— an inventory of systems which keep records;

— documentation of the implementation and changes in systems;

— procedures for maintenance of systems;

— the rules for accessing the systems;

— documentation providing evidence of system testing.

Where organizations have implemented an information security programme, whether based or not on ISO/IEC 27001, the same security management requirements including those for documented information are applicable to systems that keep records.

9 Performance evaluation

9.1 Monitoring, measurement, analysis and evaluation

9.1.1 Determining what and how to monitor, measure, analyse and evaluate

The effectiveness of the MSR is measured and records processes, controls and systems are monitored to provide information that supports continual improvement or indicates the need for corrective action (see 10.1).

In determining what needs to be measured and monitored, the organization should consider the following:

a) the level of business risk arising from inadequate records or records systems in specific areas of the organization;

b) the application of other management systems standards;

c) requirements of stakeholders (see Annex A for examples);

d) legal and regulatory requirements;

e) how recently new processes, controls or systems were implemented in a business area.

The criteria for monitoring and measuring should be reviewed regularly and modified in response to any changes in the organization's context (see Clause 4).

The methods for monitoring, measuring, analysing and evaluating records processes, controls and systems will vary depending on what is being assessed. These methods can be quantitative or qualitative. Methods can include the following:

1) user surveys;

2) checklists of questions;

3) observation;

4) collection and analysis of system usage statistics;

5) analysis of system operation data, e.g. downtime, crashes, loss of data.

The frequency of monitoring and measuring will also vary depending on what is being assessed. For example:

i) a large organization assesses specific business functions on a rotating basis,

ii) a small organization assesses the entire organization annually,

iii) an organization assesses its MSR on a more regular basis as a result of a failure to meet legal or regulatory requirements or as a result of risk assessments, and

iv) assessment is done at the completion of specific phases of MSR implementation.

Output:

Documentation is not a requirement in this Clause; however, examples of output obtained when implementing are as follows:

— criteria for monitoring and measurement;

— monitoring, measurement, analysis and evaluation methods;

— monitoring and measurement tools, such as checklists and questionnaires;

— monitoring and measurement results, such as statistics, interview notes, notes of observation, system reports, test results, surveys;

— monitoring and measurement schedule/s.

9.1.2 Evaluation of the performance of records processes, systems and the effectiveness of the MSR

The results of monitoring and measurement are evaluated to ensure that the integration and implementation of actions into the organization's MSR processes (see 8.1) have been effective. The organization ensures that the performance of the MSR fulfils business needs, legislative requirements and enhances the satisfaction of customers and stakeholders. The analysis and evaluation of monitoring and measurement results should be done after each assessment. However, trend analysis or analysis for management reporting purposes which use accumulated results can be done according to operational needs, e.g. quarterly, annually. Inputs to the analysis and evaluation process will be the results from the monitoring and measurement (see 9.1.1), internal system audits (see 9.2) and management reviews (see 9.3), as well as any identified requirements for periodic or project-based reporting. The organization uses the data collected to measure how appropriate and effective the MSR is, and to evaluate where improvement can be made.

The organization should establish, implement and maintain procedures for performance evaluation of the effectiveness of the MSR, including performance evaluation of records processes, controls and systems. Monitoring and evaluation of records processes or systems are part of the basic principles outlined in ISO 15489-1. When an organization has implemented ISO 15489-1, monitoring and evaluation procedures can normally be adapted to comply with requirements of ISO 30301.

Performance evaluation should be undertaken regularly to ensure that the MSR operates according to the records policy and requirements and user satisfaction.

Modifications to the MSR and to the records processes and controls should be made if performance results are found to be inadequate. Action should be taken, where necessary, to address adverse trends or results before nonconformity occurs. See 10.1.

Output

— Evaluation reports.

9.1.3 Assessing effectiveness

Monitoring and measurement of the MSR is done to assess its effectiveness in meeting the requirements of the records policy, achieving records objectives and satisfying business needs and stakeholder expectations.

Inputs to the assessing the effectiveness of the MSR include performance evaluation results (see 9.1.2), internal system audits (see 9.2) and management reviews (see 9.3).

The effectiveness of the MSR can be determined by indicators such as

a) a current records policy that is fit-for-purpose (see 5.2),

b) current records objectives that are achievable and meet current and immediate future business needs (see 6.2),

c) records policy, objectives, records processes and controls which have been modified in response to changes in business, legal and other requirements (see 4.2),

d) an appropriate level of resources allocated to maintain the MSR (see 7.1),

e) adequate definition of roles, responsibilities and authorities (see 5.3) commensurate with the size and nature of the organization and the scope of the MSR, as well as assignment of appropriately competent persons to those roles (see 7.2),

f) performance assessment results for the person with designated responsibilities for implementing, reporting and promoting awareness of the MSR (see 7.2),

g) results of the performance of records processes and systems (see 9.1.2),

h) existence of full documentation of the MSR and document control procedures in place and operating (see 7.5),

i) records systems that achieve the strategic, managerial and financial objectives of the organization (see 8.3),

j) a MSR training and awareness programme and communication strategy which is current, implemented regularly and revised in response to changes in the records policy, objectives, records processes and controls (see 7.3 and 7.4), and

k) results of assessment of user and stakeholder satisfaction (see 9.1.2).

Output

Performance evaluation data and documentation should be kept as evidence of performance evaluation process. Examples are as follows:

— evidence of assessment of the effectiveness of the MSR;

— performance evaluation program or plan;

— performance evaluation procedures;

— performance evaluation criteria and indicators;

— results of performance evaluation;

— gap analyses, including list of actions;

— on-going monitoring data;

— monitoring reports.

9.2 Internal system audit

The organization determines the frequency of internal system audits and undertakes them to assess whether the MSR conforms to requirements, is effectively implemented and is maintained in accordance with any changes to the records policy and objectives. Guidance about internal audits, auditors' characteristics, auditing plans and programs, and audit reports is provided in ISO 19011.

Internal audits should be done by persons who have not been involved in the implementation of the MSR. An audit programme should be established to meet the requirements of ISO 30301. When implementing different MSS, the organization can perform combined internal audits.

To determine if the MSR is effectively implemented and maintained, assess

a) the adequacy of documentation of the MSR, as well as the extent to which the documentation is reflected in practice,

b) the currency of the records policy and objectives,

c) the frequency of review of organizational context and responses to change,

d) the understanding of persons with designated roles and responsibilities,

e) the adequacy of the support provided to maintain the MSR, and

f) whether records processes and controls are implemented and maintained in accordance with their design.

Output

— Audit programme.

— Internal audit report and supporting documentation.

Some organizations can find an internal audit documented procedure useful, especially when integrating different management systems.

9.3 Management review

Top management conducts a review of the MSR to determine its current performance, to ensure its continuing suitability, adequacy and effectiveness, and to instruct improvements or changes as necessary. The management review is a comprehensive assessment of the MSR, rather than one focused on specific areas. However, particular attention can be given to areas of identified risk.

Inputs to the management review will be

a) outcomes from previous management reviews,

b) the organization's context (see Clause 4),

c) results of monitoring, measurement, analysis and evaluation (see 9.1), and

d) previous internal system audits (see 9.2).

The frequency of management reviews depends on the organization's needs and context. Influences can be

1) whether the MSR is new or been in place for some time,

2) outcomes from and responses to previous management reviews,

3) results of previous audits,

4) expectations of stakeholders, and

5) new or changes in applicable law and regulations.

The management review of the MSR can be conducted by reviewing

i) previous management reviews and action taken,

ii) any changes in the internal and external context that might affect the scope of the MSR or levels of organizational risk,

iii) previous monitoring and measurement results,

iv) previous internal audit results,

v) corrective actions taken, arising from monitoring, measurement and audit, and

vi) documentation of opportunities and action demonstrating continual improvement.

In reviewing the MSR and looking for opportunities for continual improvement, management should consider

— the continued alignment of the MSR with the organization's strategic directions that can affect the MSR,

— the adequacy of the scope and coverage of the MSR for the business processes of the organization,

