

AFRICAN DEVELOPMENT BANK GROUP



Bank Group Policy on Records Management and Archives

**OFFICE OF THE SECRETARY GENERAL AND
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Bank Group Policy on Records Management and Archives

Members of the Task Team	<p>Mr. Khandaker M Sharif ISLAM, Records Manager, PSEG0</p> <p>Mr. Mike SALAWOU, Lead Advisor to the Secretary General, PSEG0</p> <p>Mrs. Namawu ALOLO, Principal Strategy Officer, SNSP1</p> <p>Mr. Daan BOOM, Consultant, PSEG0</p> <p>Mrs. Birara HILDEGARDE, Archivist, PSEG0</p> <p>Mrs. Tabi Dominique Jeanne MESNIL, Budget Coordinator, PSEG0</p> <p>Mr. Kouassi Benjamin SOMA, Documentalist Clerk, Archives Section, PSEG0</p> <p>Mr. Snott MUKUKUMIRA, Senior Investment Planner, CHGS1</p> <p>Mrs. Roberte Tania DRUIDE AMANI, Principal Legal Counsel, PGCL4</p> <p>Mr. Olivier COSTE, Principal Solution Development Engineer, CHIS1</p> <p>Mrs. Winifred GREYWOODE, Information Security Risk Officer, PSEC</p> <p>Mr. Gao SHEN, Program Officer, CHGS1</p> <p>Mrs. Sylvie Korotimi TRAORE-TUHO, Special Assistant to FIVP</p> <p>Mr. Albert Nhawo CHIKONO, Records Assistant, PIAC</p> <p>Mr. Simon Florentin ADJATAN, Senior Corporate Infomaster, PCER</p> <p>Mrs. Liliane KOUAWO, Team Assistant, PSEG0</p> <p>Mrs. Emma Djehi Gninon TOH, Archivist, PSEG0</p> <p>M. Yves Lazare DE MEDEIROS, Archivist, PSEG0</p>
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ACRONYMS

AfDB	African Development Bank
ADF	African Development Fund
AfDB	African Development Bank (Bank Group)
AsDB	Asian Development Bank
BPPS	Bank-wide Program Processing Schedule
BCP	Business Continuity Plan
CHIS	Corporate IT (Information Technology) Services
DAI	Disclosure and Access to Information
DARMS	Document Archive and Record Management System
IaDB	Inter-American Development Bank
MDB	Multilateral Development Banks
M&E	Monitoring and Evaluation
ISO	International Standard Organization
IsDB	Islamic Development Bank
MDBs	Multilateral Development Banks
OAG	Office of the Auditor General
PCER	Communication and External Relations
PGCL	General Counsel and Legal Services
PIAC	Integrity and Anti-Corruption
PSEG	Office of the Secretary General and General Secretariat
RMAS	Records Management and Archives Section
RRC	Records Retention Classification
RRS	Records Retention Schedule
RMC	Regional Member Countries
SNSP	Strategy and Operational Policies
WB	The World Bank

1. INTRODUCTION

1.1 **Records** are primary sources of documents accumulated over the course of an organization's lifetime and show the activities of that organization. **Archives** house records selected by the organization for permanent or long-term preservation on grounds of their enduring historical, vital or evidentiary value. Vital records, according to an internal Bank memo of 1999, are "documents that will enable the Bank to restore its operations, recreate the institutions *“legal and financial position and preserve the rights of the institution, its employees and shareholders in the event of total disaster”*."¹ The same memo references SEGL, now PSEG as responsible for Bank archives.

1.2 The responsibility to maintain the Bank's records is bestowed on the Office of the Secretary General, PSEG, to "administer the document management and archive system for the Bank's central archives and records of the organizational units".²

1.3 A review of the Bank Group's archival practice in 2015 and 2017 revealed that record keeping practices across the organisation takes place in a policy vacuum and an inconsistent framework that define the nature of a Bank record, its value, and retention schedule.³ As a result, most Bank records -without assurance of their integrity and completeness- simply continue to accumulate regardless of their value and appropriate retention time. In addition, the **Disclosure and Access to Information Policy**⁴ identified a policy gap with regards to information management at the Bank. Moreover, the 2017 Internal Audit Report on "Custodianship agreement and document archiving management" recommended that the Bank should prioritize the finalization of a corporate records and archives management policy⁵.

1.4 The **Bank Group's Digital Strategy** further identified *Digital Collaboration* as a transformative theme to manage records and therefore provides an impetus for the implementation of effective and efficient Bank-wide record management and archive solution.⁶

1.5 The need for this Policy was therefore borne out of the Bank's experience managing records, internal audit recommendations and the need to provide input to the Bank's content management application to ensure that the Bank's record can be managed throughout their lifecycle with due respect for efficiency and economy.

2. RATIONALE

2.1 In addition to the above, the specific policy rationales are as follows:

- Raise staff awareness on good governance with regard the importance of records management to the organization, both strategically and operationally;
- Adopt international best practices in records management;
- Clarify responsibilities for records and archives management;
- Provide a basis for accountability by ensuring relevant, evidential information and documentation is maintained in a secure environment, retrievable and readable form;
- Provide for a cost-effective records management system that meets the organization's business need for authentic, reliable and usable records; and
- Establish how records are created, kept and disposed of.

¹ Inter-Office memorandum to Heads of Organizational Units, January 26, 1999. CADm2/National99A.

² ADB Organization Manual, January 2010. Section 2.2 ToR General Secretariat IIIAi.

³ See Annex I Bank Group's experience AND ANNEX II: Comparative analyses MDBs.

⁴ The Disclosure and Access to Information Policy of the Bank, 2012.

⁵ Custodianship agreement and document archiving management. PAGL Department, August, 2017. ADB/BD/WP/2017/149

⁶ The Bank Group Digital Strategy 2017-2020. ADB/BD/WP/2017/81

3. OBJECTIVES

3.1 This Policy aims to:

- Provide a policy framework to guide staff on records management and archive;
- Preserve the vital records of the Bank hence its institutional memory and evidence of the Bank Group's activities in all formats to support transparency and accountability in operations and management in the most cost-effective way;
- Protect the records of the Bank and improve timely access by authorized staff and stakeholders;
- Improve on the regulatory compliance of records through use of retention schedule
- Promote the digital management and preservation of documents and records through their lifetime;
- Rationalise storage cost with effective use off-site storage and retention schedule.

4. SCOPE

4.1 This Policy is applicable to all records and medium either created or received by the Bank in its operations and corporate activities regardless of their format or location. Specifically, this includes official and work-related information, documents and records generated by:

- Headquarters, regional hubs and Country Offices including External Representation Offices of the Bank
- Complexes, Departments, Units, Divisions whether operational or nonoperational which generate, hold and use Bank's information, document and records;
- Boards of Governors and Boards of Directors during statutory meetings and Committee meetings;
- Special and/or independent entities of the Bank unless otherwise approved by the Bank;
- Regular staff, Consultants and any other third parties in contract or partnership with the Bank; and
- Third parties in doing business with the Bank as part of Bank's due diligence and appraisal.

4.2 Personal records, or records belonging to an individual staff member or contractor not received, created or used in the conduct of the Bank business fall outside of the scope of his Policy.

5. GUIDING PRINCIPLES

5.1 This Policy is a principle-based policy and a self-contained resource. These principles shall guide overall interpretation. The policy will be accompanied with Staff Handbook. The policy shall relate to and support any other relevant Bank policies aimed to improve the Bank's position and exposure as an open, transparent and knowledge-based Bank. To do this, the policy is grounded on the following guiding key principles:

- Responsibility of records: Records are the property of the Bank, but every record has also a responsible staff member as custodian. Staff members are responsible for managing and organizing the records they receive and create in the course of conducting business⁷;

⁷ This Policy refers to staff members as defined in PD No. 04/2013 concerning the Security of Information and Appropriate Use of Communication Systems in the Bank, 18 June 2013: Users or users shall include Elected Officers, their Senior Advisors and Advisers, regular Bank employees, employees hired on a short term basis, Bank-employed Consultants, and any individual

- *Value based record management*: Each record will be assessed by staff to determine the administrative, operational, legal, historical and cultural value. Once the value of the record has been determined, the management of such records follows applicable retention period assigned to it;
- *Life cycle records management of Bank's record*: a record by nature has a life cycle. As such a Bank-wide lifecycle approach to records management is adopted by establishing consistent practices, procedures, and (digital) security in the creation, classification, archiving and disposition of records. Each Bank record will attempt to be managed accordingly from when they are created or received (in paper or electronic form), used, referred to, archived and at the end of their active life disposed of (destroyed, permanently stored);
- *Electronic records management*: The preferred capturing and storage format of record is electronic. Since electronic document management has more benefits, Bank Group documents shall be created or converted into electronic format to the extent possible. However, limited number of records given their nature can be maintained its original format

5.2 Where applicable, the Bank Group's policies, strategies, and related administrative rules, procedures and guidelines will be aligned with this policy to support the implementation requirements.

6. KEY PROVISIONS

6.1 In the context of this policy, a document shall mean pieces of information that have not been made final or remain as draft. They are retained as information or working copies by staff, departments or units. If documents have fulfilled their short-lived purpose they should be routinely disposed of. A record is any document that has been made **final** and is no longer meant to be altered.

6.2 Records provide evidence of decisions and actions taken as part of the execution or support of the Bank's activities. They document Bank Group policies, decisions, contracts, processes, activities, and transactions, and preserve its institutional memory. They must be preserved until the administrative, legal, or fiscal use has expired. Beyond the regulatory requirements, certain records may be determined by the appropriate authority and in consultation with the Secretary General to have significant historical and cultural value. These records must be kept indefinitely.

6.3 Destruction of records, alterations during their retention period or subject to a Legal Hold is prohibited. Unauthorized destruction of records includes deleting, altering or corrupting the Bank Group records or impairing their accessibility or readability. Persons found guilty of contravening such actions may be subject to disciplinary actions as stipulated in the Staff Handbook.⁸ Where there is a possibility of litigation, audit, or investigation involving the Bank Group, all regularly scheduled destruction of records associated within the inquiry or potential inquiry must be suspended immediately and will become subject to a system of holds. Records under a Legal Hold cannot be modified or deleted, even when otherwise specified by the Records Retention Schedule.

employed or hired to provide services for the Bank and to other persons or entities granted access to the Bank's information, documentation and records systems either permanently or temporarily.

⁸ Sections of the Staff Handbook that relates to staff responsibilities with regard to: 3.2 Compromise; 3.6 Discretion; and 3.9 Intellectual Property Rights.

Table.1: Examples of records that needs to be captured and records which can be disposed of:

Records that must be captured and managed	Records that do not need to be captured
<ul style="list-style-type: none"> • Are likely to require action, follow-up, or reply • Provide evidence of policies, processes, activities, and transactions • Provide evidence of key decisions that will be of value to the Bank Group when making decisions in the future • Are original records related to the Bank Group business that do not exist elsewhere. 	<ul style="list-style-type: none"> • Drafts that do not provide evidence of key decisions • Information that has been received and used as reference or for which many copies are available • Personal records or documents kept only for convenience • No work-related content or has any evidentiary value.

6.4 This Policy supports the intent of an electronic record keeping culture through encouraging paperless communication and electronic distribution and retrieval of information as enunciated in various relevant policies and frameworks of the Bank.

6.5 The DAI policy shall form the basis of this records management and archive policy with regard to classifying, accessing and protecting records together with other policies, strategies, and related administrative rules of the Bank.

7. ROLES AND RESPONSIBILITIES

7.1 Individual Staff Members⁹ - are responsible for the direct implementation of this Policy by classifying and maintaining the Bank’s official records they create until such time that these records are transferred to the Records Management and Archive Section (RMAS) of PSEG or disposed of in accordance with records retention and disposition schedules (Annex III).¹⁰ Staff are responsible for assessing and determining if the information constitutes a record as defined in this Policy and apply the appropriate record classification settings.¹¹

7.2 Heads of Departments and Units have the primary responsibility for (a) ensuring that departmental records created and received under their responsibility are managed and organized in compliance with this Policy; (b) maintain a recordkeeping space and ensure that records concerning their activities are captured in the Bank-wide records management systems (DARMS, SAP, etc); (c) ensure that classification, disposal and retention are applied to the records for which they are responsible; (d) ensure that their staff are trained and understand and follow the Records Management Policy, and relevant guidelines and procedures and; (e) ensure that records are timely transferred to RMAS in PSEG for final archiving.

7.3 The General Secretariat Office (PSEG), through the Records Management and Archives Section (RMAS), is entrusted with the responsibility of implementing the Policy, monitoring the Bank-wide management of records according to the principles of the Policy to ensure compliance, and reporting to the Board on its implementation. It shall issue a **Records Management and Archives Handbook** and will conduct the necessary staff capacity building

⁹ Staff members as defined in President’s Directive No. 04/2013. See details in footnote 7, paragraph 5, Guiding Principles.

¹⁰ Personal records, records belonging to an individual staff member or contractor that is not received, created or used in the conduct of the Bank business does not fall under the records management and archive policy.

¹¹ The Bank Staff Manual provides disciplinary articles for staff not in compliance with protecting and securing bank information.

efforts. The RMAS, in consultation with the Bank Departments, ensures day-to day implementation of this Policy.

7.4 In consultation with appropriate Departments PSEG will determine **Retention and Disposal Schedules**. PGCL will notify PSEG and concerned departments of any Legal Hold and specify the records concerned not eligible for disposal.¹² Any changes to the existing Hold status will be notified by PGCL through issuance of a Legal Release order when appropriate.

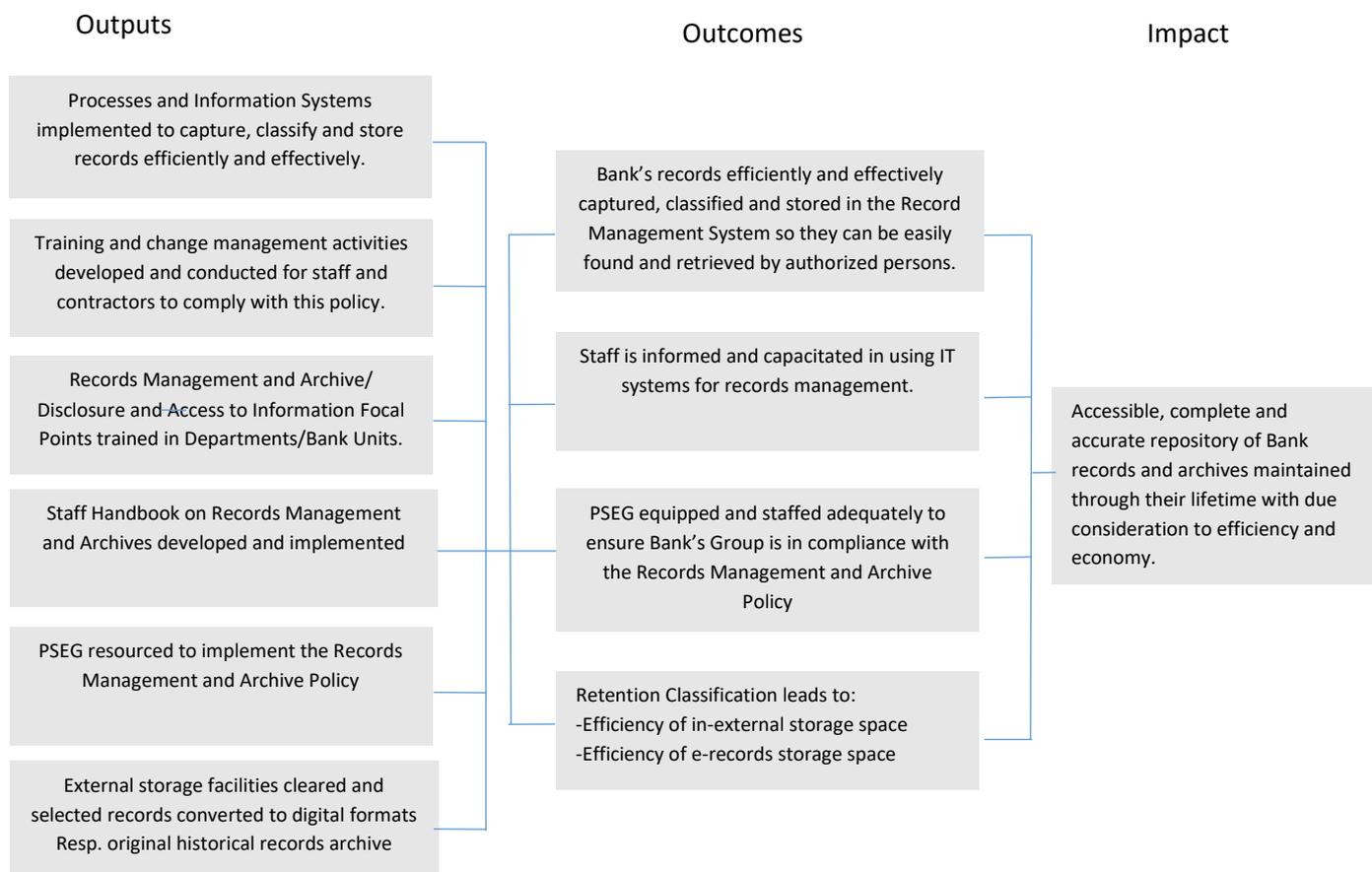
7.5 Corporate Information Technology Services (CHIS) will provide Bank staff and the RMAS with the required applications and technology. CHIS will avail technology and equipment for integrating and converting digital records to new standards, to ensure that records remain retrievable and readable throughout their lifetime.

7.6 The roles, responsibilities and processes on records management will be further detailed in the Records Management and Archives Handbook.

¹² Legal hold concerns any internal or external formal and informal investigations that requires access and review of records.

8. IMPLEMENTATION AND MONITORING OF THE POLICY

8.1 Specific Bank and departmental procedures will be prepared or revised to comply fully with the provisions of this Policy and incorporated into the Staff Handbook on Records Management. Training and awareness sessions of Bank staff are foreseen in coherence and coordination with the specific themes of the digital strategy. The high-level results framework of the policy is as follows:



8.2 A detailed Results Framework and implementation timeline of the Records Management and Archives Policy is presented in Annex II.

8.3 A **Staff Handbook on Records Management** and Archive will be issued by PSEG. This Handbook will provide detailed guidelines to staff on the organization and management of Bank records through its life cycle, the specific roles of staff with regard to classification, retention, archiving and disposal of records. It shall also prescribe steps for the transfer of records, digitization of paper-based records for long time preservation and procedures for on- and off-site storage.

8.4 To structure and organize records and documents efficiently, PSEG, in collaboration with PGCL and other relevant Departments, will draft and release a **Records Retention Schedules** (Annex III). The Records Retention Schedule will describe in exhaustive manner and per Department of the Bank, types of records and information it generates or in possession of, how long such records must be kept before final disposition actions (destruction or permanent preservation). The Records Management and Archives Handbook will include a **File Management Plan** with specific instruction on how records should be physically and electronically organized.

8.5 The current and existing IT environment for records management (DARMS) will be modified and enhanced to act as a **trusted digital repository** for records management. It is expected that DARMS, the Bank-wide Program Processing Schedule (BPPS), and the Disclosure and Access to Information (DAI) system will become an integral part of the new content- and records management environment.

8.6 The implementation of a Bank wide records management will be based on an implementation and communication plan accompanied by an awareness and training program to ensure that staff are informed and capacitated in the use and application of the Bank's electronic content and record management system.

8.7 The Focal Points already in place in the context of the Disclosure and Access to Information will also serve as focal points on records management related matters.

8.8 To streamline existing Committees' work on policy implementation and to better leverage the synergies among complementing policies, the **Information Disclosure Committee (IDC)** created by the **PD/01/2013** will also oversee the implementation of this Policy. In so doing, Management will take appropriate actions to expand the scope of work of the IDC to include that of this Policy.

8.9 Given the work required for a successful implementation (Staff Handbook on Records Management and Archives, Digital Records Repository in DARMS, capacity building, staff training, change management and communication), this Policy will become effective nine (9) months from the Board approval date.

8.10 Management will carry out a review of this Policy eight (8) years after its implementation to ensure that the Policy and Handbook are effective for Bank's business, meet service quality and compliance requirements.

9. RESOURCE IMPLICATIONS

9.1 The resource implications of implementing this policy will be kept at a reasonable level. Detailed resource implication is captured in Annex III. Management will draw synergies with and leverage the DAI Policy and Digital Strategy both in terms of staffing needs and financial resources required. Nevertheless, it is expected that during the implementation period 2018-2019 extra costs will occur, associated with training, development of technical-, and guidance materials. Maximum synergy will be drawn with Bank's digital strategy activities. As a result, savings will occur in terms of communications, change management, as well as saving virtual and physical space for records.¹³ It is also expected that significant synergy effects will take place in the maintenance and use of current content management applications (DARMS, e-BOARD, BPPS).

10. REPORTING REQUIREMENTS

10.1 In the same vein of rationalizing implementation of complementing policies, Management will provide to the Board of Directors a **joint Annual Report on Information Disclosure & Access and Records Management & Archives** concerning the implementation of this Policy. PSEG as implementing unit of the two policies will ensure timely submission of such report.

¹³ An in-depth analyses of costs savings is not conducted but it is assumed that once documents become available in electronic format less archive space is needed and printing and duplicating costs reduced. It is furthermore expected that the investments of the Bank Groups Digital Strategy for content management will have significant synergy effects in systems and procedures for DARMS, e-Board, BPPS, and DAI.

11. CONCLUSION

11.1 This Policy provides the Bank with an institutional policy framework on record management. It is expected that implementation will streamline records and archives management while preserving institutional memory according to acceptable standards (See Annex II Comparative table of MDB's practices). The rolling-out of an electronic records management system will reduce operational risk, support the Bank's openness and transparency objective through better disclosure and access to information. Finally, Management is of the view that implementation of this Policy, will in the long run result in cost savings to the Bank by putting in place an efficient and secured integrated electronic records management for vital documents of the Bank.

11.2 The Boards of Directors are therefore requested to consider and approve the Bank Group Policy on Records Management and Archives as contained in this document. The proposed Policy on records management and archives will be effective six (6) months from Board approval.