



Policy on

# Electronic Records Management

for

# Trinidad & Tobago Government Internet (Web) Presences

Version 1.0

December 2006

**Table of Contents.**

**1. POLICY NAME ..... 2**

**2. TARGET AUDIENCE..... 2**

**3. SCOPE OF APPLICATION ..... 2**

**4. POLICY PURPOSE..... 2**

**5. POLICY OBJECTIVES..... 2**

**6. POLICY CONTEXT ..... 3**

**7. POLICY MAINTENANCE HISTORY ..... 3**

**8. INTRODUCTION..... 5**

**9. POLICY PRESCRIPTIONS ..... 8**

**9.1 Requirements of TTGOV web sites include: ..... 8**

**9.2 Recommended standards for TTGOV web sites include: ..... 10**

**11. REFERENCES ..... 13**

## **1. Policy Name**

Policy on Electronic Records Management for Trinidad and Tobago Government Internet (Web) Presences.

## **2. Target Audience**

This Policy is targeted to the Managers, Legal Services Branches, Communication Specialists, IT Professionals, Records Management Specialists or any persons responsible for the design, development, maintenance and approval of content and business services provided on or through web sites and portals for Ministries and agencies in the Public Service.

## **3. Scope of Application**

This Policy is applicable to Internet web sites and portals of:

- (i) All Government Ministries, agencies, departments and the Tobago House of Assembly,
- (ii) All statutory authorities.

The Ministry with the responsibility for the e-Government Portal will administer the requirements of this Policy. Any requests for exemptions or exceptions to this Policy should be forwarded to the Ministry with responsibility for the e-Government Portal in writing and will be subject to Cabinet approval.

Independent or state-owned companies are not covered by this Policy. It should be noted, however, that this Policy sets out records management practices and practices relating to web-based activity that should be viewed as "best practices" suitable for adoption by the companies that are not officially covered by the Policy.

## **4. Policy Purpose**

The purpose of this Policy is twofold:

- 1) to ensure that policies and procedures are established to create and retain records of web-based activity in order to meet legal, business, social and accountability standards and expectations; and
- 2) to ensure that policies and procedures are established to manage electronic records created by interactions with TTGOV web sites.

## **5. Policy Objectives**

The following electronic document management standards are intended to ensure that:

- Adequate records are maintained of web-based activity; and
- Electronic records created by interactions with TTGOV web sites are managed, i.e., retained, authenticated, stored and disposed of in accordance with an established and recognized protocol.

In order to achieve these objectives, the Government of Trinidad and Tobago will:

- Create a "records continuum" for web-based records;

- Put in place internal mechanisms for creating, managing and retaining web-based records for as long as those records have value;
- Include appropriate metadata on web site electronic records;
- Develop an electronic records preservation plan; and
- Maintain an adequate record of web-based activity.

Subsequent policies will elaborate and complement these standards in such areas:

- (i) Content Management
- (ii) Authentication
- (iii) Privacy

## 6. Policy Context

This Policy on Electronic Records Management shall be consistent with the general policy on presentation and preservation of government material and may be amended from time to time.

Legislation and guidelines relevant to this Policy include:

Constitution of the Republic of Trinidad and Tobago  
 Government Communications Policy  
 Civil Service Act, No. 45 of 1979  
 Freedom of Information Act, No. 26 of 1999, as amended  
 Copyright Act, No 13 of 1997, as amended  
 Tobago House of Assembly Act, No. 37 of 1980  
 Exchequer and Audit Act  
 Data Protection Policy and Commentary  
 Electronic Transactions Policy and Commentary  
 Policy on Content and Presentation Design Standards  
 Policy on Network Security and Access Control  
 Policy on Risk Management (Draft)  
 Policy on Remote Access for the Public Service (Draft)  
 Web Content Privacy Policy (forthcoming)  
 Web Content Management Policy (forthcoming)

## 7. Policy Maintenance History

Date	Change Details	Author	Version
Dec 13 '06	Amendments after consultation	ICT policy	1.0

The ICT Policy and Stakeholder Engagement Unit of the ICT Division, Ministry of Public Administration and Information is responsible for this document.

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**The Effective Date of this Policy is the date of approval by the Cabinet.**

**For existing web presences as of September 1, 2006, compliance shall be no later than November 1, 2007**

## 8. Introduction

In line with its objectives outlined in the National ICT Strategy, *fastforward*, the Government of Trinidad and Tobago is developing a central Portal for the dissemination of government information and provision of government services. This e-Government Portal is intended to provide a single point of entry for end user access to government information and services, whether delivered through electronic means or other channels.

The central Portal and *fastforward* together provide unique opportunities for communication with citizens and Internet users throughout the world. It also provides new opportunities for provision of services and creates the potential for new forms of services, including improved and better targeted interactions with citizens, more extensive consultations with stakeholders involved with new policies and government activities, and enhanced democratic structures.

This Policy on Electronic Records Management has two main objectives. The first is to ensure that adequate records are kept of web-based activity on TTGOV web sites. This may be necessary for a number of reasons, including risk management (see associated Policy on Risk Management and Policy on Content Management), creation and preservation of historical records, and the maintenance of a corporate memory for the Government of Trinidad and Tobago. In future years, online text and resources will be a vital part of the documentary record of Trinidad and Tobago. It would be cruelly ironic if the richness of information and enhanced means of communication that are being made possible by new technologies were to be lost to future generations because of the potentially ephemeral nature of electronic communications. If future generations of the people of Trinidad and Tobago are to understand their history, life in the early 21<sup>st</sup> Century, and the role of Government in the lives and economy of their ancestors, they must have access to significant documents and online resources and records of web-based activity. There may also be circumstances in which a record of web-based activity will be required as evidence in legal proceedings. Ensuring that these records meet legal standards of admissibility as evidence will be an important element of this Policy.<sup>1</sup>

The second objective is tied to the first in that it is aimed at managing and preserving electronic records that are created through interactions on TTGOV web sites. These will be important for the archival reasons mentioned above, but are also important for the accurate and effective management of the electronic transactions being carried out through Portal web sites. The recordkeeping practices for these electronic transactions will also have to meet standards of admissibility as evidence, if necessary.

Good recordkeeping in a web-based environment has a number of procedures in common with good management of paper documents. Both rely on a systematic approach; web-based recordkeeping includes:

- Taking responsibility for recordkeeping;
- Developing strategies for developing full and accurate records of the information that is needed to carry out the functions of the organisation;
- Formulating an electronic records preservation plan; and
- Implementing website maintenance procedures.

Not all electronic documents or electronic data are considered “records” for the purpose of recordkeeping. The process by which a public record is created is important for determining its classification as a “record”: records are by-products of business activity and, in the case of

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<sup>1</sup> See also, Electronic Transactions Policy (approved by Cabinet, January 2006) which establishes rules under which electronic documents may be admitted as evidence into court.

public officials, are created as part of their official duties. The Electronic Records Committee of the International Council of Archives has defined a "record" as "recorded information collected, created or received in the initiation, conduct or completion of an institutional activity and that comprises sufficient content, context and structure to provide evidence or proof of that activity." Records thus have an evidential and transactional nature that lends them certain characteristics. These characteristics include:

- Records are "fixed": the information is static or "set" and can be relied upon for authenticity;
- Records are "contextual": much of their meaning and value as evidence is derived from the context in which they are created, maintained and used;
- Records are "organic": they are a natural output of a sequence of transactions;
- Records are "official": they are created as part of the ongoing work or business activity of the organisation, i.e., are created "in the normal course of business";
- Records are "unique": when maintained in context with sequence and inter-relationships, they are "one of a kind."

A complete record therefore includes not only content, but also structure (including physical format and relationships between data elements and the references that link successive records) and context (e.g., the business function or activity in the course of which the record was created).

Records management should be thought of as the management of a *records continuum*, which begins with the concept of designing the recordkeeping system before the record is created through to disposal or the continuing use of the records as archives. The initial appraisal stage of designing a records continuum involves assessing the business activities to determine what records need to be captured, how long they need to be kept and so on. Archives are records that have a continuing value for ongoing legal, evidential or research purposes or because they have a value to society at large. The design of a recordkeeping system should include a designation of those records to be archived and those that should be destroyed according to an established schedule that takes into account such factors as legal time limits, personal data protection legislation and policies, audit requirements, and historical value.

Recordkeeping in a web-based environment poses certain challenges. In many cases, particularly in the early stages of the development of TTGOV web sites and the Portal, the web sites will be static—essentially a collection of documents tied together with hyperlinks. The only interactivity is the movement among the documents provided by the links. Maintaining records of web activity on these sites is relatively simple and can be done, for example, by maintaining logs of the web site and changes and by periodically making "snapshots" of the web site as a whole.

The Portal, however, will frequently be providing public access to TTGOV web sites with forms that can be downloaded or, in some cases, filed electronically by members of the public. In this case, records may need to be kept of downloads or of the information provided when a form is completed and returned to the Ministry, department or agency. The transactional capacity of the web site will have to be integrated into the organisation's normal recordkeeping activities (assuming that the transactions mirror non-web-based transactions being handled currently by the organisation).

Web sites also have the capacity of being dynamic, with users querying the content of a database. A dynamic web site raises new issues for recordkeeping. The web site will be, in effect, personalized for the user as the user's queries are used to build the web page. Thus the queries from the user may have to be captured as part of the recordkeeping for the web site. The information in the database "behind" the web site may also be changing. Depending

on the nature of the database and the interaction with the user, the recordkeeping focus may be placed on individual transactions or on the content of the website at any given point in time.

Capture of transactional web site information raises issues of the protection of personal privacy. The relevant Data Protection Principles (approved by Cabinet in January 2006) must be followed when collecting, retaining or disposing of personal information.

## **9. Policy Prescriptions**

### **9.1 Requirements of TTGOV web sites include:**

#### **9.1.1 General Web-based Electronic Document Management**

**Policy Guideline:** **Required**

Each Ministry, department and agency must establish a process that creates a "records continuum" for the records that will be placed online or that will be created through web-based interactions or transactions.

**Policy Guideline:** **Required**

Each Ministry, department and agency should review its web-based records continuum plan to ensure that all legal requirements are being met with respect to such matters as records retention, data protection, data sharing, and Government audit and accountability requirements.

#### **9.1.2 Identification of Web Site Records**

**Policy Guideline:** **Required**

Each ministry, department and agency must identify records that exist on their web sites or that are about to be placed online. These records must be captured into their existing recordkeeping system, along with sufficient metadata to document the content, context and structure of the records and their placement on the web site.

#### **9.1.3 Metadata**

**Policy Guideline:** **Required**

Each ministry, department and agency must include metadata on web site electronic records that, at a minimum, captures the context of their creation and their structure, as well as content. the metadata should include such information as:

- Date and time of capture
- Links to URI (universal resource indicator), including information about version and date of link to URI
- Technical details about web site design
- Details about software used to create the web resources
- Details about applications, including search engines, that supplement the web resources
- Details about user software needed for viewing
- Structure of the record

#### **9.1.4. Electronic Records Preservation Plan**

**Policy Guideline:** **Required**

Each Ministry, department or agency must develop and implement an electronic records preservation plan.

**Policy Guideline:** **Required**

Each Ministry, department or agency must ensure that the storage media and related technologies used for maintaining electronic records are designed so that the evidential elements of the records are accessible but cannot be altered.

**Policy Guideline:** **Required**

Each Ministry, department and agency must plan for technological obsolescence by ensuring that electronic records, including records of web-based activity, can be copied, reformatted or migrated without loss of their integrity as records.

#### **9.1.5 Record of Web-based Activity**

**Policy Guideline:** **Required**

Each Ministry, department and agency must ensure that an adequate record is maintained of web-based activity.

**Policy Guideline:** **Required**

All pages within a TTGOV web site must have a date indicator to signal to users that they have reached the end of that page and to signify the currency of the content.

#### **9.1.6 Data Protection**

**Policy Guideline:** **Required**

Each Ministry, department or agency that maintains a log or other record of identifiable personal information must comply with the requirements of the Data Protection Policy with respect to the collection, use and security of personal information.

## **9.2 Recommended standards for TTGOV web sites include:**

### **9.2.1 General Web-based Electronic Records Management**

**Policy Guideline:** **Recommended**

Each Ministry, department and agency must assign and document responsibilities for web-based electronic records management and recordkeeping, including responsibilities for content development, web site management, data administration, records continuums development, documenting procedures and establishing preservation procedures.

**Policy Guideline:** **Recommended**

Each Ministry, department and agency should align its records continuum plan for a TTGOV web site with the web site risk management profile established pursuant to the Risk Management Policy

### **9.2.2 Identification of Web Site Records**

**Policy Guideline:** **Recommended**

Each ministry, department and agency should capture web-based records into the recordkeeping system (including the necessary recordkeeping metadata) at the time the information is posted to the web site.

### **9.2.3 Metadata**

Policy Guideline is mandatory.

### **9.2.4. Electronic Records Preservation Plans**

**Policy Guideline** **Recommended**

Each Ministry, department and agency, in developing its strategies for electronic records preservation, should consider the maintenance required to preserve the functionality of electronic records.

**Policy Guideline** **Recommended**

Each Ministry, department and agency should put in place procedures for testing and carrying out random spot checks to monitor the functionality and integrity of web-based records.

**Policy Guideline****Recommended**

Each Ministry, department and agency should include preservation and migration plans in the metadata of records that will be retained for a considerable length of time.

**Policy Guideline****Recommended**

Each Ministry, department and agency, in developing its strategies for electronic records preservation, should consider security controls and audit trails, as well as adoption of open standards that meet the requirements for longevity and migration requirements.

**Policy Guideline****Recommended**

Each Ministry, department and agency should use persistent identifiers for their online resources.

### 9.2.5. Record of Web-based Activity

**Policy Guideline:****Recommended**

Each Ministry, department or agency should use snapshots for object-driven websites only. Each snapshot should include scripts, programs, plug-ins, and browser software (i.e., all the elements necessary to make the snapshot fully functional).

**Policy Guideline:****Recommended**

Each Ministry, department and agency should maintain a historic log for each of its web sites. The log should include:

- Title or name of posting
- Version of posting
- Originating author or person responsible for content information (see Policy on Risk Management)
- Hyperlinks to the posting
- Date of initial posting
- Date of last modification
- Date of replacement or withdrawal
- Disposition of posting after replacement or withdrawal (e.g., destroyed, archived on web site, archived elsewhere)

Note: the log is itself a record that should be part of the recordkeeping system and have its own record continuum plan.

**Policy Guideline:**

**Recommended**

Each Ministry, department and agency that maintains a dynamic or transactions-based web site should ensure that logs are maintained of site visitors and should ensure that transactions, along with necessary metadata, are captured and integrated into the organisation's recordkeeping system.

**Policy Guideline:**

**Recommended**

Each Ministry, department or agency should consider the value of creating an online archive of information posted on its web sites.

**Policy Guideline:**

**Recommended**

All page currency indicators should use the ISO standard for all-numeric date display (YYYY-MM-DD) and use one of the following formats: Date published, Date modified, or Last updated.

### **9.2.6 Data Protection**

All Policy Guidelines are mandatory.

## 11. References

1. Australia, National Archives, Archiving Web Resources: A Policy for Keeping Records of Web-based Activity in the Commonwealth Government, January 2001.
2. Australia, National Archives, Archiving Web Resources: Guidelines for Keeping Records of Web-based Activity in the Commonwealth Government, March 2001.
3. Australia, National Archives, Helen Heslop et al., An Approach to the Preservation of Digital Records, December 2002.
4. Australia, New South Wales, State Records, Guideline No. 14, Future Proof: Ensuring the accessibility of equipment/technology dependent records, April 2002.
5. Australia, New South Wales, State Records, The New Australian Recordkeeping Standard
6. Canada, British Columbia, Supplement to the Core Policy and Procedures Manual, Chapter 12, Information and Technology Management Manual, Release 1.1.3, September 2004.
7. Charles R. McClure, Guidelines for Electronic Records Management on State and Federal Agency Websites,
8. United Kingdom, e-Government Policy Framework for Electronic Records Management, 2001, [www.e-envoy.gov.uk](http://www.e-envoy.gov.uk)