

Comments log for Draft 2.0 – first full draft

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11 Aug 06

Sub-section	Sub-section paragraph	Page	Comment
PRELIMINARIES (preface, acknowledgements, executive summary, abbreviations)			
General			1. Although full of really useful information this document is not easy to read and changes style between Chapters 1-4 and 5. Although the initial Contents was consulted on, in reality with the text behind the sub-headings, the document doesn't hang together well. An alternative structure is suggested below.
General			2. The document needs to be more focused on being "guidance". Consideration should be given to merging most of the topics of the first and third part of Section 3 (Reg Requirements and perhaps Business Drivers) into Section 1, but moving the detail into an Appendix. The second part of Section 3 on Technological Drivers is more an "Issue" for later consideration. Shortening these opening chapters would then enable the reader to get to the nitty gritty of "what records are required" (Chpt 2) and "how should they be managed" (Chpt 3) quicker.
General			The second chapter "Scope of Records to be Held" could start with the recommended list for a Land Quality File (Chapter 4) and then have sub-sections which discuss the various parts of the Land Quality File – some of which is dealt with in the existing subsection 2.1 and 2.2. Much of the information Section 2.3 could be added to an Appendix (other than Security) – as it is not directly applicable. The "Security" section should be part of Data Management.
General			The 3 rd Chapter could be Record Keeping Systems, Data Management and Protocols (which is currently Chapter 5).
General			And a 4 th Chapter could be "Other Issues" which could include: The existing parts of Section 3.3 covering - Openness, Transparency, Account - Transfer to Non-Paper Media - Spatial Referencing - Succession Planning
General			Chpt 5 Conclusions
Executive Summary		4-6	This should be redrafted as an ES for technical people. If a non-technical summary is needed it should be a separate document.

Executive Summary		4	The whole of the Exec Summary needs to be a lot more focussed and needs to really be an Exec Summary from which "busy people" can quickly glean an understanding of what the doc is about, the issues and the solutions. Thus: – the first 3 paragraphs tend to talk around the subject rather than summarise the contents of the guidance. The opening paragraph needs to refer to SAFEGROUNDS Key Principle 5 on record keeping. - The proposed Land Quality file and other checklists need to be referred in the Exec Summary.
Executive Summary		4	The conceptual model diagram is difficult to understand -there's no link to any of the text in terms of discussion of the different parts -it is not obvious where we start and finish in terms of a Life Cycle. -it is also not obvious what solid lines mean and dotted lines -what does the stakeholders box mean and the arrows from it -what is the cylinder called "E".
Executive Summary		4	The last but one paragraph starting " <i>By consistently..... The guidance should be used to identify</i> " should be at the beginning as an introduction to the guidance – or moved into Section 1 Intro & Background. <i>(In addition, the list does not even talk about the type of information required (see comment above on the LQ File), which is an important part of the report.</i>
Executive summary	Para 1	4	"without good records.." amend "good" to "reliable"
Executive summary	Para 3	4	"...had a duty to keep proper records..." amend "proper" to "key"
Exec sum		5	Record keeping diagram is slow to load
Abbreviations		7	Numerous abbreviations that have been used within the document are not listed i.e. IAEA, IPSV, IMAGES etc. Office of the Deputy Prime Minister is now the Department for Communities and Local Government (DCLG)
Abbreviations		8	GIS Definition should be "Geographic" rather than "Geographical"
Contents		8	Titles for Appendices C, D & E are missing.
SECTION 1 – INTRODUCTION & BACKGROUND			
All		9-19	This is far too long. It should be shortened to 2-3 pages of introduction to the guidance. Background to the project belongs elsewhere (perhaps in an information paper on the SAFEGROUNDS website).
1.1		9	Needs to be restructured, shorter and more focused. The opening paragraphs should be removed and replaced by one paragraph which mentions SAFEGROUNDS Key Principle 5. (In the current

			doc there is no mention of KP5 until the just before the diagram – which is too late).
1.1		9	Do we clearly state who the target audience is for this report? (Assuming we need to?)
1.1		The diagram	Remove – this doesn't include Key Principle 4.
1.1		"Applying..."	Remove - unnecessary
1.1	Flow Diagram	10	Flow diagram itself is relatively straightforward to understand (some missing arrows) although I was unsure what benefit is derived from presenting the Principles in this way or what they are trying to convey.
1.2			"Background" – not an appropriate title for this section. As a SAFEGROUNDS project it would be more appropriate to call this sub-section "Stakeholder Interests" and to put the list into a 2 column table with headings – "Stakeholder" and "Expectation"
1.2		"This guidance..."	Move to the beginning of Section 1.2.
1.3	Whole section	12	Suggest placing section 1.3 (definitions) prior to section 1.2 (background)
1.4		4 "Good practice..."	Para 4, 1st line – needs to include something on instigating short term measures to monitor and control contam, and development of a prioritised programme to deal with the contam.
1.5			Include this section in proposed section 1.2 on "Stakeholder Interests"
1.5		13	Does section 1.5 really need to go under Section 3 as it discusses drivers
1.6		14	I think there needs to be more feedback from the SLCs on how they currently approach the subject of record keeping. Section 1.6 should really start to tease out some of the existing problems and examples of the effects of these problems.(but not case studies here).
1.6 and 1.7.			Swap the order of Section 1.6 and 1.7.
1.7		17	Do we want case studies so early in the text?
1.7		17	In my view the "importance and benefits of good record keeping" is what this guidance is all about. I am surprised that only a few words are dedicated to this section.
1.7	Para 2	17	" without good records..." Amend "good" to "reliable"
1.7	Para 3	17	" If a good records management programme.." amend "good" to "effective"
1.8			Doesn't add much – remove as a section or incorporate some of the text into earlier sections.
		Box - Stewardship Findings	??? Not referred to in the text.
SECTION 2 – SCOPE OF RECORDS TO BE HELD			
2		20	While there has been previous discussions on this would the report read better if Section 3 came before the current Section 2?

2.1	Bullet points	20	Include possible surrounding land uses which may contribute to on-site contamination
2.1 & 2.2		20	These need to be edited to be consistent with the SAFEGROUNDS land management guidance (at present LMGv1).
2.2		4 th bullet	Contam mngt and rem records for each source of contamination.
2.3		20-23	This is unnecessary. A brief para signposting guidance on the relevant topics is all that is needed.
2.3			The section could be removed from the main document, but added as an Appendix - this is useful information but most is not directly relevant.
2.3	Whole Section	20-23	Suggest that this section be shortened to keep in line with Sections 2.1 & 2.2. Detailed references to the other guidance listed could be placed in an appendix to keep the main document more focussed.
SECTION 3 – DRIVERS AND RESPONSES			
3 (all)		24-31	Most of this is unnecessary because it either duplicates material that can be found elsewhere or it is not guidance. It would be best to remove this section and weave the useful material into other sections, recasting it as guidance where necessary.
3		24-31	The drivers for keeping and maintaining records is not just because of regulatory expectations etc. Stating the obvious we need to keep records because the information is required for decision making in the future or to support decisions already made. Without creating a duplication of text I would like to see a greater link here of the types of work being undertaken require us to keep records. This links into the section on Land Quality File.
3			See General Comment above – this section would be better incorporated into others.
3.1		24-27	This is only about nuclear-licensed sites and largely repeats HSE material.
3.1			Suggest the Reg requirements are referred to only in Section 1 and the detail is moved to an Appendix.
3.1	Sub section Safety Assessment Principles	26	Improved reference to the Safety Assessment Principles, where they originate and what the relevance of the RW7/CL_8 nomenclature is, would assist understanding
3.1		27	Do the numbers (612 – 615) refer to Draft SAPs?
3.2		27-28	This is only about the NDA (ie a sub-set of nuclear-licensed sites).
3.3		28-30	This should be moved elsewhere and recast as guidance.
3.3	28	Transfer to Non-Paper Media	<p>Not in the right place – this gives the impression that the biggest technological driver is transferring information to non-paper media.</p> <p>Needs cross referencing to the section on media types (existing Section 5.6) and Appendix B.</p> <p>Opening line “Thenot least because of the volume of records still kept on paper and the”.</p> <p>2nd paragraph</p>

			"Site ownersregarding the disposition of original records that have been copied into electronic form" Mention of the pitfalls of electronic media – even if it's just a cross ref to Section 5.6 and Appendix B.
3.3	Spatial Referencing (Para 2)	29	This second paragraph is rather negative and should include the key considerations when designing a spatial data management system to ensure it ties in with long-term records management (rather than just providing pitfalls of a GIS approach as at present).
3.4		30-31	This should be reduced to a paragraph and moved.
SECTION 4 – LAND QUALITY FILE			
4 (all)		32-33	This is too specific to nuclear-licensed sites and too elaborate for some other types of site, especially smaller ones.
4			A good list but needs more explanation of at least the main headings (-after all, this is a guidance doc!!). The Section Remediation and Delicensing – needs splitting into two as delicensing does not necessarily include remediation. (Might be worth noting that: delicensing may include leaving buildings in tact– the requirements and records for these being outside the scope of this doc). Also in Section 10 Rem. Include the records of any imported materials used for backfilling voids and landscaping.
		32	Sections 3 & 4 of the file could give rise to duplication of information as the sub-section titles do not indicate much differentiation.
		33	Section 8 – is it envisaged that the sub-section 8.2 includes all the details of radiological & non-radiological contamination within the soil?
SECTION 5 – RECORD KEEPING SYSTEMS AND ASSOCIATED PROTOCOLS			
Section 5 in general			Section 5 doesn't follow in the same sense as Section 1-4. The whole of section 5 seems to be trying to sell a "new product" rather than saying what a good system should look like and what is good practice (which is what Sections 1-4 do). A similar approach to the Land Quality File could be used ie A good record keeping system will have the following attributes: list eg - A system for: - creating new records - organising records in a logical order - actively managing the records (where the period of active management can be several years) - inactively managing records that are not frequently used - reviewing old records and either destroying those no longer required, or permanently storing those of legal or historical significance etc etc

			Then discuss the points in the list. Also ref some of the detail to the check list in Appendix A.
5.1	Figure	35	The figure does not clearly demonstrate the overlaps within the lifecycle.
5.1		34-36	The authors seem to have lost the plot. There needs to be guidance here, not discussion of current practice.
5.1		Sub-section "Different Systems.."	Unnumbered diagram "Record Keeping Life Cycle..."
5.1		Sub-section "Different Systems.."	This is meaningless, there's no explanation, no indication what a solid line means and a dotted line and no obvious way into the diagram. Also what does the cylinder called "E" refer to?
5.2		36-38	Personally, I don't find the records life cycle concept at all helpful, especially in the case of non-nuclear sites. There is also some unnecessary jargon here.
5.2		37	In the 4 phases mentioned, the explanation for Phase 1 doesn't discuss creation and organisation – rather it discusses making an inventory of records and deciding what needs destroying (...hardly creation!).
5.2		37	Rather than "Records Creation and Organisation" it reads as "Review of Records and Destruction of superfluous records".
5.3		38-42	This is too prescriptive (eg use of 'must'), is not appropriate for smaller organisations and sites, and fails to bring together regulatory requirements and other standards and guidance (eg BS documents).
5.3		38	Retention – this overlaps with some of Section 5.2 – the earlier section should therefore cross ref the later section.
5.3		38	The contents of Section 5.3 covers much more than just "Retention of Records". Suggest this title is changed to "Reviewing, Classifying and Setting Retention Periods"
5.3	"1. Perform inventory.."		The report is about contam land records. The records inventory should therefore include a review of the relevance of the record to contaminated land issues and how to ensure records not originally collected for contam land purposes are given this "extra" context.

5.3	2. Establish..		How does the "Classification" reflect multiple contexts eg con land, decommissioning, building record, waste record from decom etc. How are multiple classed records prioritised in terms of importance relative to the context
5.3	Sub-section 2	38	Typing error "..sometimes referred to as a fling plan.." amend to "filing plan"
5.4		42-44	Ditto, plus a lot of this is too general: this guidance must be specific to contaminated land.
5.4		43	Is the responsibility for records, limited to those with archiving/managerial duties or does it extend to those who generate the records? If it extends to those who generate the records this would require training for all personnel within an organisation.
5.4	Induction training section – last para	44	"Every year Managers should (to) submit written confirmation that the department has complied with the Records retention Policy" Question: does anyone currently do this ?
5.5		44-48	Ditto.
5.5		Access and Indexing	There's nothing on ways of accessing data – which would include: - card index systems - electronic index systems - using maps to drive data retrieval (eg GIS) - use of the internet for wide accessibility.
5.5	Access & Indexing – author's commentary	44	UKAEA can offer indexing and appropriate metadata examples used at Dounreay and Harwell sites (via Records Managers)
5.5	Turnaround time for retrieval of records	48	" A useful rule of thumb: if the records are accessed less often than once per month, it is generally more cost-effective to move them to offsite storage" Disagree – storage is cheap but retrieval costs from commercial storage is high and costs will soar if retrieving regularly.
5.6		48-51	Ditto and there is too much discussion and too little guidance here.
5.6			This section is the main one dealing with media types, although Appendix B is fairly thorough – but is not adequately referred to in the main body of the doc.
5.6			Suggest the title of Section 5.6 is changed to "Media Types and Storage Requirements".
5.6			It could then have an opening short paragraph on the different types of media - which then refers to Appendix B which contains the detail.
5.6			There is no advise/guidance on long term organisational ownership of records and record transfer (as properties change ownership).
5.6	Storage Environment for different Media Types – last note "Important"	51	UKAEA – Windscale have copied waste package records on to permanent paper, placed inside copper-impregnated bags and stored in acid-free archive boxes.
5.7		51	This needs to be redrafted to contain guidance.

5.7	Para 1	51	"...records that are not destroyed will be permanently stored in the organisation's archives." Add "....."or transferred to Place of Deposit e.g TNA"
5.7	Para 4	51	"a certain amount of archival material is designated for preservation in the records retention schedule" Note - UKAEA do not include "preservation" material in the record retention schedules – this type of material is identified at the review stage (under unscheduled records).
5.8, 5.9, 5.10		51-56	Same comments as on Sections 5.3 and 5.4.
5.9	Para 1	53	Typing error "... to bring it records management policy to life" "...it's record management"
5.1	Reviewing Records for Destruction - Section	55	"...records classification and retention period assigned..." Add "or review period".....assigned
5.1	Ensuring That Authorisation for Destruction ...section – para 1	56	Note – UKAEA do not have signatures (automated system) and when referred to depositing department prior to destruction – timescale is usually 1 month.
5.1	Ensuring That Authorisation for Destruction ...section – para 3	56	Note – UKAEA only provide a destruction certificate for classified destructions. Other destructions are recorded in the automated RMS system.
END PAGES (references, glossary)			
Glossary		58-64	The first part of the Glossary is inappropriate because it is not consistent with LMGv1. The second part does not seem to be very helpful because it introduces jargon that is not (or should not) be used in the text.
			Conclusions – none given.
Glossary of Records Management Terms	Document and Record	62 and 64	Should be a clearer distinction between a document and a record. Not all documents are records. Document is usually a single item, whereas a record, although singular too, is (quote ISO 15489) "info created, received and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business".
			Could have the glossary and the abbreviations next to each other. Currently abbreviations are at the front of the report.
APPENDICES			
A & B		65-71	These are specific to nuclear-licensed sites and repeat material from HSE documents. It would be better to simply signpost the documents and delete these appendices.
A	Bullet point 6	65	"Check that permanent records are retained for at least 30 years"....

			Contradiction re permanent and 30 years.
C		72-?	I do not think it is useful to include this appendix.
D		73-77	Ditto. This case study is not about contaminated land and is not at all helpful for most users of this document.
E		78	This just looks like advertising. Please delete.
			Some good quality case studies would be useful.
GENERAL COMMENTS			
Comments on the Document			
			This is a very disappointing draft. It is far too long (about twice the length of the main text of LMGv1), contains too little actual guidance, is inconsistent with LMGv1 in some respects and will be difficult to make consistent with LMGv2 as currently envisaged (particularly if LMGv2 covers all the types of site that could be radioactively contaminated).
			A lot of the problems seem to have arisen because it is unclear who this guidance is for. My understanding is that this guidance is for technical people, including those who may not be very familiar with record-keeping systems that are potentially relevant to contaminated land. It needs to address the major problems that such people face, including the expectations of other stakeholders. It should do so in a way that is not prescriptive, ie the tone should be 'this is good practice', not 'this must be done'.
			It is important that the document is made consistent with LMGv1, particularly by including guidance for defence sites and by using the same terminology (eg definitions of 'management' and 'contaminated', not using 'remediation'). It is also important to make it easy to update the document to be consistent with LMGv2.
			The whole document should be much more concise and focused. Background material and discussion of current and past practice should be kept to a minimum. (If necessary such material could be moved to an information paper for the website. Case studies are best placed in the website area for these, not included in this document.) Unnecessary jargon should be avoided. Other guidance should be sign-posted, not reproduced verbatim. The objective is to produce useful guidance, not to write an all-embracing report.

		<p>Check lists – the document needs an overarching high level checklist which draws the various parts of the guidance together and cross references to the various parts of the guidance. These might then be the “Recommendations” of the report which should then be highlighted in the Exec Summary.</p> <p>The only checklist in the guidance is Appendix A – which is OK and is needed, but is at a level which should have been drilled down from the higher level.</p> <p>Eg High Level Check list: Records Management</p> <ul style="list-style-type: none"> - Ensure procedures and protocols for managing records are in place – Ref section 5.4 - Ensure contaminated land records are accessible – now and in the future - QA/QC arrangements for records management – Ref - Determine the preferred media for storage of the records and use this for newly generated records – Ref Appendix A - Put in place arrangements to transfer old pertinent records into the preferred media or, put in place a system which can cope with multi-media formats - Determine the maintenance requirements for the records management system with respect to ensuring record integrity in the long term <p>Records</p> <ul style="list-style-type: none"> - Ensure that records pertinent to contaminated land are identified and are categorised in terms of importance relative to this intended use – Ref 5.3 - Determine the format required for contaminated land records - Determine the retention period for those records identified as being pertinent to contaminated - Determine QA/QC procedures for the record – including metadata requirements, revision control, access control - Identify the ownership/custodian of the record and transfer arrangements - Determine the maintenance requirements for the record <p>Etc etc</p>
		<p>Formatting of the doc – only two levels of numbering have been used eg 1 and 1.3 etc. However within a subsection there are several unnumbered sub-headings. To make these sections more directly referenceable (eg refs in checklists), suggest you go to three levels eg 1.2.5.</p>
		<p>Overall it is felt that the document contains a large amount of valuable information but could benefit from being more focussed in a number of areas to produce guidance rather than purely technical information. In particular, the non-technical reader may find it difficult at present to digest the salient points of the guide and be lost in the detail</p>

			<p>I have read through it and it looks pretty comprehensive – I can't think of any major comments to make at this stage.</p> <p>From an implementation point of view the main thing is to ensure that the guidance is of practical use to lower and middle management on the ground, otherwise it won't be of any lasting benefit. This was a criticism of the original SAFEGROUNDS guidance.</p> <p>It would also be worth mentioning somewhere the LMG–SITF document on record keeping produced in ~2000 that we put on the SAFEGROUNDS website</p>
			Sorry I have not been able to respond in the timescale.
			In the main most of the information and text is now within this version of the report, but it is quite long which may put off the reader. I would continue to think if there is any way of shortening the report so that the key messages are clearer and use appendices to house some of the detailed underpinning information.
			The figures do not have figure numbers on them.
			It is difficult to tell if the figures have been generated specifically for this report or if they have been taken from existing literature. If the latter they need to be referenced.
			Do we need a short concluding section?
Comments on the Consultation Process			
			<p>The consultation process for this document seems to be based on the premise that there will only be detailed comments on the text at this stage. Such a process will only work if there has been wide consultation at an earlier stage on the form, function and outline contents of the document. Instead, most of the early consultation seems to have been restricted to the PSG and to workshops involving relatively small numbers of people. The result is that the first draft that many participants in SAFEGROUNDS see is a highly unsatisfactory one. I imagine that it will be difficult to rectify all the problems with the document within the timetable and budget for the project.</p>
			<p>On this form, and within the document itself, consultees are encouraged to submit new text, case studies etc. Many will not have the resources to do this. Those who do are likely to work within the nuclear industry or MoD, or to work as their contractors. This inherently limits the range of views that will be represented in the final document.</p>