

# Preparatory discussion paper 1, for SAFEGROUNDS PSG meeting 9, 30 March 06

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### Preface

Summary of the documents creation and development history

### Acknowledgements

### Executive Summary

#### *One page non-technical overview*

This Best Practice Guide provides guidelines and rules for properly managing records and record-keeping for contaminated land and land quality within Nuclear and Defence Sites. By consistently following this advice, we improve our ability to locate information when needed and ensure that stakeholders comply with all applicable laws and regulations. More specifically, the purpose of this guide is to communicate:

- The records management responsibilities of all stakeholders within related industries.
- The proper procedures for the maintenance and handling of active and inactive records.
- The access and security procedures that must be in place to insure the appropriate level of protection for records.
- The procedures associated with preparing, sending, and retrieving inactive records to and from all applicable repositories or records centres.
- The procedures associated with destroying records whose retention period has expired.
- The procedures associated with the suspension of destruction when required by litigation or audits.
- The procedures for confidential destruction.

- The procedures for protecting historical records and moving them to an appropriate archive facility.
- The procedures for protecting vital records to ensure business continuity in the case of a disaster.
- The procedures for obtaining and using document imaging or documents management systems.
- The Records Management Training Procedures.
- The procedures for monitoring compliance to the Records Management guidelines.

## **1 Introduction and Background**

### **1.1 Introduction**

- Objective of document
- SAFEGROUNDS Context
- Approach to meeting the objective
- Consultation process
- Definitions

### **1.2 Background to the Need**

- Key Stakeholders

#### **Why record keeping affects you**

- Description of the nature of contaminated land management and the current state of records and record keeping in the industry
- Existing guidance and cross reference to other SAFEGROUNDS documents
- Importance and benefits of good record keeping

Best practices in records management are rooted in pragmatism: The intent is to enable companies to define a practical records management programme for achieving compliance, and not necessarily to establish a "perfect" records management programme. In records management, best practices function as guiding principles for designing and implementing a compliant programme. Best practices provide value for every organisation-whether the goal is a consistently average programme or a "5-star" programme.

In records management, consistency is everything. Records management should be viewed like any other compliance programme: The primary objective is to be able to project an image of good faith—not necessarily to have a perfect programme. Organisations should be able to prove they've

made a good faith effort to consistently develop, implement, and oversee a compliant programme. If a programme is consistently applied, issues that arise in the future are less likely to be viewed as suspicious and more likely to be seen as an isolated problem.

### 1.3 Scope

- Relevance to individual Stakeholders
  - Areas of relevance
  - Life Cycle of a site
  - Types of Site
  - Investigation
  - Characterisation
  - Land Release
  - Liabilities
- 
- Contaminated land desk study, site investigation, risk assessment, monitoring, decision making, remediation, validation
  - Site data, records, plans, incident reports
  - Hard copy, electronic, drawings, photos, GIS, samples
  - Recording of information (including spatial information)
  - Setting up and maintaining the record
  - Information about the record
  - Accessing, archiving, preservation
  - Quality assurance
  - Existing record keeping schemes and initiatives
  - Future reporting, data transfer and file format requirements

*Examples of record-keeping areas that are likely to be relevant to the study*

- *Site and building history*
- *Environmental records*
- *Geological and hydrogeological contexts*

*Results of site investigations such as sources, types, amounts and concentrations of contaminants*

- *Land quality information from areas not suspected as being contaminated*
- *Remediation records including records of decisions such as why a particular option was chosen, which stakeholders and what regulatory interactions were involved in decisions*
- *Safety cases*
- *Post-remediation verification surveys of land condition*
- *Monitoring records such as groundwater, including long term monitoring*

- *Maintenance records associated with remediation schemes such as use of physical barriers and caps etc*

## 2 Principles of Best Practice

Covering Drivers, Regulatory Requirements, Technical Difficulties & Practical Problems.

- Why do you need best practices for record keeping?
  - Consistency
  - Integrity of data
  - Examples of Good & Bad Practice
  - Types of record
  - Formats
- Principles of Best Practice
  - Business Process Drivers
    - Business Continuity & Succession Planning
    - Risk Management
    - Improved business processes
  - Regulatory Drivers
    - Transparency
  - Organisational & Evidentiary Drivers
    - Chain of Custody
  - Technological Drivers
    - Format & Accessibility
    - Anticipating future needs & Integrating new solutions
    - Future Proofing & Flexibility

*Following is indicative content given in the specification, which will only be touched on at a high level if the overall balance and size of the document is to be maintained - feedback on this would be welcomed as well as contributions from any SAFEGROUNDS members who have a particular interest / involvement in the issues concerned:*

General need and pressures/ drivers for record-keeping as a whole:

- national and international
- land registry systems
- standards - BSS, ISO etc
- IAEA
- long term stewardship
- growing need for transparency and accessibility

Specific obligations, needs and tasks:

- HSE/ EA site licence conditions and other existing mandatory requirements for record-keeping
- ensuring data quality assurance, integrity, adequacy, completeness
- storage, preservation, management, retention requirements
- how record-keeping obligations extend to materials leaving site
- land registry/ planning needs
- MOD and NDA (national archive) requirements
- legal requirements to keep records in particular forms
- relevant initiatives in the harmonisation and accessibility of data transfer (systems should have the potential to align with any significant future mandatory requirements)
- need to make information readily accessible so it is retrievable for stakeholders

#### Formats:

- storage media
- safety/ readability
- future proof
- project/ multiple storage
- legal requirements

#### Accessibility:

- custodianship
- durability
- degree of centralisation of the system
- metadata
- spatial references
- searchability
- indexing
- contextualisation
- categorisation

*There are many existing initiatives in this area that will need inputs from SAFEGROUNDS members to help identify, sift and bring out the important points, such as guidance on the relevant scope and aims of the NDA's national nuclear archive and the requirements it will place on NDA licensees and guidance given by the HSE Nuclear Safety Directorate to its inspectors. Feedback will be required on how much importance is attached to Brownfield site development related topics and wider generic schemes such as:*

- *Emerging experience in public recording of land condition and remediation in the context of EPA90 Part IIA and the Planning regime*
- *National initiatives eg the SILC scheme on Land Condition Records (through IEMA), or SHIRE the proposed National Site History Register (through EP)*
- *Other national requirements eg formal and informal guidance from the EA on Land Quality Assessment Reports and Land Quality Statements,*

*Remediation Validation Reports, IPPC Baseline and Validation/ Cessation Reports*

- *IAEA and other international guidance (eg US Long Term Stewardship programme) including decommissioning records*
- *European cadastre system and other land register systems, particularly for brownfield development of chemically contaminated land*
- *E-Government Initiative*
- *Any relevant BS or ISO standards that may apply*
- *FoI legislation and Electronic access requirements from Government*
- *Eurocodes, high level European initiatives on harmonisation of data management and transfer, existing and emerging guidance on metadata, AGS formats and XML formats*
- *Existing systems for geotechnical and contaminated land information management*

### **3 Record Keeping Systems and Associated protocols**

- Existing Systems
  - Strengths
  - Weaknesses
- Recommended Approaches
- Policies and Procedures
  - Records Management Life Cycle
  - Personnel Issues (Responsibilities)

Includes creation, organisation, management (active/inactive) and retrieval and disposition overview

- Indexing & Access
  - Metadata
    - Spatial Information
  - Classification
    - Cross-Referencing
  - Record Ownership
    - Transfer of Ownership
  - Revisions & Addition
    - Version Control
- Retention
- Disposition
- Storage Environment (Physical & Electronic)
  - Different Media Types
  - Preservation
  - Security
  - Confidentiality
- Compliance & Accountability
  - Records Management Steering Group
- Quality Control
- Reporting

## New systems and improving/ incorporating existing systems

- Different systems for different sites
- Handling site-wide and project specific levels
- Types of records required: factual, interpretive, decisions
- What records should be kept and over what timescales? (H&S, environment, community issues, litigation and evidence requirements etc)
- Cross referencing to project stages, SAFEGROUNDS and decommissioning
- How records and records management feature in restoration and the post restoration stages of the life cycle of a site
  - for licensed sites - where restoration is to an interim end-point, or a de-licensable end-point; and
  - for defense sites or non-licensed nuclear sites - where restoration is to a point where land can be reused by the current owner, or divested for other use
- Personnel issues
  - who should have responsibility for creating, managing and retrieving records?
  - what instructions need to be provided on using records?
  - how can internal 'buy-in' to good practice be achieved?

*This will require input from SAFEGROUNDS Members, possibly at a Workshop, aiming to highlight opportunities and pitfalls*

## 4 Good practice guidance

*Following is indicative content given in the specification, some of which will only be touched on at a high level (review of land registry systems, site changes, existing Brownfield site record formats) unless feedback is received from any SAFEGROUNDS members who have a particular interest / involvement in the issues concerned:*

- Good practice principles
- Specific good practices approaches
- Checklists and recommendations
- Review of land registry systems in the UK, Europe and the USA
- Issues in relation to change of site use, ownership and the associated transference of liabilities
- Application/ integration of existing record formats such as the Land Condition Record, Land Quality Assessment, EA B20 Report Format and associated guidance for voluntary inspections under Part IIA
- Insights from examples of existing good and bad practice

- The use of different media for record keeping such as written, computer, electronic, photographic, physical model, video, drawing, map
- Use of information about the record (metadata)
- How records should be stored, protected (commercial and confidentiality issues), categorised, filed, maintained (to avoid degradation) and referenced
- Systems for tracking revisions to records
- Other devices such as standard templates for record-keeping
- Creation of flow diagrams/decision trees to sign post the reader to the relevant advice
- Conclusions

*The SAFEGROUNDS steering group will need to be involved in discussion to determine the extent of record-keeping being advocated (do records need to be kept for everything or is some prioritisation based on cost/ benefits appropriate?).*

## **Active Records Management**

Records related to “open” or in-process activities are called Active Records. These records are typically referred to on a regular basis in response to internal and external business requirements. The period of time during which records are active varies by record class and by departmental requirements.

Active records should be maintained on-site at the business location, within the departmental areas. Active records may be sent to a Records Centre if space does not permit them residing within the department.

Hardcopy records (paper, photographs, microfilm records, and production films) should be stored in filing equipment appropriate to the record media, size, and security status. All employees are expected to maintain their files in a manner that is secure and logical for the type of record being maintained.

To ensure that electronic records can be identified and located when needed a standard naming convention should be established within each department.

Electronic records that meet the criteria of *Official Records* should be moved to Company shared network drives and placed in the proper folder to ensure that the record is being protected and retained in accordance with the Records Retention Schedule. Official records should only be placed on drives or other media that are secure and backed up on a regular basis.

## **Inactive Records Management**

Official records with infrequent access requirements or those that refer to closed, completed, or concluded activities, are *Inactive Records*. Inactive

records have outlived their active stage but must be retained for operational reference purposes or to meet legal retention requirements.

Each Department is responsible for scheduling and implementing purges of on-site records to manage office space. Purging is the process of removing inactive material from active storage areas for inactive storage or for destruction. As part of this process employees must determine which inactive official records should be retained on-site, which should be sent to off-site storage and which records are candidates for immediate destruction review in accordance with the Company Records Retention Schedule. Unofficial records (convenience copies, drafts, etc.) should be discarded at this time.

Departments should not initiate destruction of on-site records without approval of the Corporate Records Administrator. The destruction process should be managed by the Corporate Records Administrator in accordance with confidential destruction procedures.

## **Transfer of Records to and From Offsite Storage**

All inactive official records which require to be retained for longer than routine business use should be transferred to a Records Centre. A general rule of thumb is that if the records are accessed less often than once per month, it is generally more cost-effective to move them to offsite storage.

If Company records are stored anywhere other than onsite or an offsite Records Centre, the Corporate Records Administrator must approve such storage. Inactive records can be maintained in offices as long as space, equipment, cost, security, access, and retrieval meet Company criteria.

Only official records should be sent to Records Centres. Duplicates, convenience copies, drafts and other types of unofficial records should remain on-site and be destroyed as soon as possible after their useful life, and should never be retained longer than the official record.

## **5 References**

### **Appendices**

#### **1. Checklists**

- 1.1. Simple tools & utilities**
- 1.2. Flow diagrams**
- 1.3. Photographs**

#### **2. Existing Industry initiatives**

#### **3. Specific problems**

*We have reviewed the list of the range of issues that dealt with in the Specification, noting that this is the result of initial discussions with SAFEGROUNDS members. Our view is that the list of issues is comprehensive, but that the challenge is to produce guidance that is accessible to a range of stakeholders, including the non-technical reader, and to develop a clear flow process through the Record keeping lifecycle. The aim will be to produce good practice guidance that is readable, pragmatic, clear and effective.*

*We recognise that QA, databases and record keeping are not likely to be the first skills of current and future holders and users of contaminated land data and we would like to provide anecdotes and case studies to illustrate the points made – any contributions from SAFEGROUNDS members would be welcomed.*

*We would like to hold a Stakeholder Workshop to receive feed-back, suggestions and generate involvement in order to:*

- Refine scope*
- Elicit views of NDA, Regulators and Licence Holders*
- Obtain information on current record keeping practice in the industry*
- Produce case studies of good and poor practice*