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

*Information et documentation — Systèmes de gestion des documents
d'activité — Lignes directrices de mise en oeuvre*

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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 of the voluntary nature of standards, the meaning of ISO specific terms and expressions related to conformity assessment, as well as information about ISO's adherence to the World Trade Organization (WTO) principles in the Technical Barriers to Trade (TBT), see www.iso.org/iso/foreword.html.

This document was prepared by Technical Committee ISO/TC 46, *Information and documentation*, Subcommittee SC 11, *Archives/records management*.

This second edition cancels and replaces the first edition (ISO 30302:2015), which has been technically revised.

The main changes are as follows:

- alignment with the new edition of ISO 30301 (ISO 30301:2019);
- modification of [Annex A](#).

Any feedback or questions on this document should be directed to the user's national standards body. A complete listing of these bodies can be found at www.iso.org/members.html.

Introduction

This document has been developed to assist users to apply the management system for records requirements of ISO 30301. ISO 30301 specifies the requirements for a management system for records (MSR) where an organization needs to demonstrate its ability to create and control information created, received and maintained as evidence and as an asset by an organization, in pursuit of legal obligations or in the course of conducting business.

The purpose of this document is to provide practical guidance on how to implement a management system for records (MSR) within an organization in accordance with ISO 30301. This document covers what is needed to establish and maintain an MSR. This document does not modify and/or reduce the requirements specified in ISO 30301. An activity or documenting an activity is considered mandatory only when it is required in ISO 30301.

The implementation of an MSR is generally executed as a project. An 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 document can be used in both situations. An MSR can be an advisable option for addressing legal or technological uncertainty in some cases.

It is assumed that organizations that decide to implement an 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 an 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 document 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 are unique and its specific contextual requirements will drive the MSR implementation. Smaller organizations will find that the activities described in this document can be simplified. Large or complex organizations can find that a layered management system is needed to implement and manage the activities in this document effectively.

Guidance in this document 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 context analysis needed to implement an MSR. From this analysis, the scope of the MSR is defined and the relationship between implementing an MSR and other management systems is identified.

[Clause 5](#) explains leadership and how to gain the commitment of top management. The commitment is expressed in a records policy and the assignment of responsibilities and authorities.

[Clause 6](#) deals with planning the implementation of the MSR and adopting records objectives, 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, awareness, communication, and documented information.

[Clause 8](#) deals with defining or reviewing and planning the operational level. It includes the analysis to determine records to be created (see [8.2](#)) and the design and implementation of records processes, controls and systems. 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 how to implement requirements in ISO 30301:2019, Annex A.

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[Clauses 9](#) and [10](#) deal with performance evaluation and improvement against planning, objectives and requirements defined in ISO 30301.

For each of the Clauses 4 to 10 of ISO 30301:2019, this document 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;
- 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, with special mention to mandatory documented information, on completion of the activities.

The concepts of how to design the operational records processes are based on the principles established by ISO 15489-1. Other documents 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 document for implementing the detailed operational elements of the MSR.

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

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

1 Scope

This document gives guidance for the implementation of an MSR in accordance with ISO 30301. This document is intended to be used in conjunction with ISO 30301. It describes the activities to be undertaken when designing, implementing and monitoring an MSR.

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

2 Normative references

The following documents are referred to in the text in such a way that some or all of their content constitutes requirements of this document. 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 — Records management — Core concepts and vocabulary*

ISO 30301, *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 and ISO 30301 apply.

ISO and IEC maintain terminology databases for use in standardization at the following addresses:

- ISO Online browsing platform: available at <https://www.iso.org/obp>
- IEC Electropedia: available at <https://www.electropedia.org/>

4 Context of the organization

4.1 Understanding the organization and its context

4.1.1 General

The context of the organization should determine and drive the implementation and improvement of an MSR. The requirements of this clause are intended to ensure the organization has considered its context and needs as part of the implementation of an MSR. The first part of this analysis is to determine internal and external issues relevant to the purpose of the MSR and how they affect its ability to achieve the intended outcome.

The contextual analysis can be used to define the scope of the MSR (see 4.3). However, if the top management determines the scope of the MSR as the starting point, before identifying contextual issues, then the extent of the contextual analysis is defined by the scope.

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

Examples of important issues in identifying how the external context affects the MSR are:

- a) how the complexity of the organization's structure, business and legislative environment will affect records policy, processes, systems and controls;
- b) how a competitive market affects the need to demonstrate efficient processes.

Examples of internal issues effecting the MSR are:

- 1) how laws, regulations, policies, standards and codes affect the design of records processes, systems and controls;
- 2) how the skills and competencies within the organization can affect the need for training or external assistance;
- 3) how the organizational culture can affect compliance with the requirements of the MSR;
- 4) how the information technology infrastructure and information architecture can affect the availability of records systems or records;
- 5) how rules already implemented can affect the design of the MSR; and
- 6) how contractual relationships affect records retention decisions or information access decisions.

Sources of information about the organization's external context can include the following:

- laws, regulations, standards, codes of practice, rules of industry regulators, corporate governance rules, and directives;
- the litigation profile of the organization and regulatory action affecting the organization;
- economic, financial or environmental analyses from government or industry analysts; and
- media reports.

Sources of information about the organization's internal context can include the following:

- key corporate documents such as policies, strategies, business plans, annual reports;
- audit reports;
- organizational structure, definition of roles, responsibilities and delegations;
- internal standards, guidelines, codes;
- business process maps or descriptions;
- skills assessments;
- information systems inventories;
- information or data models;
- risk analyses;
- information security framework;
- contextual analyses from implementation of other management systems standards;
- project management methodologies;

- procurement and contracting models; and
- an understanding of organizational culture (which may not be documented).

Depending on the organization, the identification of internal and external issues can have been performed for other purposes, including the implementation of other management system standards. In such cases, a new analysis will possibly 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

There is no specific requirement to document the results of the analysis, but the organization can decide to include this in a:

- list of internal and external issues affecting the MSR;
- chapter in a manual or project plan for implementing the MSR;
- chapter in a manual of an integrated management system (including more than one standard);
- formal report on the analysis of the organization's internal and external context and how it affects and is affected by the MSR; and
- series of documents about the context of the organization.

4.1.2 Records requirements

Based on the analysis described in [4.1.1](#) as the starting point, the business needs for records and the requirements for their creation, capture and management are assessed in relation to the business functions. ISO 30301 requires documenting both business needs and records requirements.

NOTE This MSS approach for context analysis and identification of requirements is compatible with the analysis process (appraisal) proposed by ISO 15489-1 and ISO/TR 21946, which also includes elements of planning (see [Clause 6](#)) and identification of the needs for records (see [8.2](#)).

The records requirements affecting the business operation can be business, legal, regulatory or other requirements.

Identifying business requirements should take the following into account:

- a) the nature of the activities of the organization (e.g. mining, finance, public services, manufacturing, pharmaceutical, personal services or community services);
- b) the particular form or ownership of the organization (e.g. a trust, company, non-profit 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;
- e) planning of future accomplishments and development of business; and
- f) risk management and continuity planning.

Examples of business needs for records are as follows:

- requirements to create records to execute or complete specific processes (including web-based transactions, as well as, but not restricted to, business transaction in emerging technologies such as social media, mobile computing and cloud computing);
- requirements to create records for financial/operational reporting and control;

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- requirements to create records for internal and external reporting;
- requirements to create records to control and monitor outsourced services or processes;
- requirements to create records for analysis and planning;
- requirements to create records to provide information about the organization's activities to specific stakeholders, such as shareholders or clients; and
- requirements to create records that explain the conclusions and decisions made automatically by artificial intelligence, machine learning, big data or similar algorithms.

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 processes,
- new and emerging technologies [e.g. cloud, mobile, artificial intelligence (AI), machine learning, big data, internet of things (IoT), blockchain and distributed ledger technologies (DLT), etc.],
- freedom of information (FOI) and government transparency programs, and
- personal identifiable information (PII) protection measures.

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.

Examples of the business requirements are as follows:

- requirements to control and access records required in different locations and over specified periods of time;
- requirements as to what evidence is needed of access to, and use of records (e.g. personal data); and
- requirements to share and re-use information contained in records.

Determining all of the mandatory legal and regulatory requirements applicable to the organization includes reviewing:

- 1) general statute and case law;
- 2) sector-related laws and regulations;
- 3) privacy and other records and data management legislation;
- 4) regulation of information security; and
- 5) legislation for electronic commerce.

Other requirements can come from voluntary standards, codes of best practice, conduct and ethics, and other sources. For example, the documented information requirements of other management systems standards.

Output

Documentation of the identification of the business needs of records, and the identification of records requirements is mandatory in order to conform 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 the MSR;

- a formal report on identification of requirements for the MSR;
- a list of all applicable laws and regulations related to the creation and control of records; and
- a set of legal precedents on particular subject matters relevant to the organization.

4.2 Understanding the needs and expectations of interested parties

The results of the analysis described in [4.1](#) should help to determine the interested parties that are relevant to the MSR as well as their requirements.

Examples of interested parties are as follows:

- employees;
- customers;
- investors;
- suppliers;
- regulators;
- competitors;
- trade and professional associations;
- academia and researchers;
- communities; and
- nongovernmental organizations.

Each type of interested parties can have different needs and expectations in relation with records. ISO 30301 provides some general examples which include good governance, transparency, protection of the legal rights and entitlements, availability of records for research, and the records documenting significant historical and cultural events. Each organization should make its own analysis and determine if some or all of them apply.

When addressing the needs and expectations of interested parties, the organization should take into account:

- 1) how external interested parties' values or perceptions affect records retention and disposition decisions or information access decisions;
- 2) how relationships with internal interested parties, values or perceptions affect the way records are managed; and
- 3) how records are made available to interested parties.

Assistance in identifying needs and expectations of interested parties can be obtained from different sources, for example:

- legal experts with knowledge of civil and common law and the interaction between them (this is particularly important where organizations operate across multiple jurisdictions);
- employees with wide understanding of their business area;
- customer panels;
- records, information technology and systems professionals;
- auditors, risk and other compliance professionals; and

- records/archives institutions or regulatory bodies.

Output

There is no specific requirement to document the results of the determination of interested parties and their requirements, but the organization can decide to include this in:

- a formal study identifying interested parties;
- results of an enquiry on relevant needs and expectations of these interested parties; or
- a summary of identified needs and expectations.

4.3 Determining the scope of the MSR

The scope of the MSR is a decision made by top management and clearly outlines the boundaries, applicability, 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 issues (see 4.1.1), records requirements (see 4.1.2) and needs and expectations of interested parties (see 4.2) but can also be stated by top management from the starting point before identifying issues, records requirements and needs and expectations of interested parties.

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 work process or a group of them;
- b) identification of relationships between organizations when MSR is established for specific functions across organizations and the roles of each of these organizations;
- c) description of how the MSR integrates with the overall management system and with other specific management system standards implemented by the organization (e.g. ISO 9001, ISO 14001 and ISO/IEC 27001); and
- d) identification of any processes that affect the MSR that are outsourced and the controls for the entities responsible for the outsourced process.

Output

Documentation of the scope is mandatory in order to conform with ISO 30301. This 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.

4.4 Management system for records

Implementation of an MSR includes establishing, maintaining and continually improving the system following the requirements of ISO 30301. The overarching requirements are specified and related to the set of processes that, together, form an effective management system for records in conformance with ISO 30301.

The processes in ISO 30301 include:

- analysis and strategic planning (see [Clauses 4](#) and [6](#));
- operational planning and record processes, controls and systems (see [Clause 8](#)); and
- performance evaluation processes externally provided processes, where applicable (see [Clauses 9](#) and [10](#)).

Output

There is no specific requirement to document the requirements in this clause because the requirements for documentation of the management system are explicitly identified in the other clauses of this document.

The main output of this clause is the management system for records fulfilling the requirements of ISO 30301.

5 Leadership

5.1 Leadership and commitment

The leadership and 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.

Leadership and commitment of top management includes:

- ensuring that the records policy and records objectives are established and are compatible with the strategic direction of the organization;
- ensuring the integration of the MSR requirements into the organization's business processes;
- ensuring that the resources needed for the MSR are available;
- communicating the importance of effective records management and of conforming to the MSR requirements;
- ensuring that the MSR achieves its intended outcome(s);
- directing and supporting persons to contribute to the effectiveness of the MSR;
- promoting continual improvement; and
- supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

The requirement to demonstrate leadership and commitment of top management does not require a specific activity to be performed but is essential for the success of the MSR. Leadership and 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

There is no specific requirement to document the leadership and commitment of top management 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 leadership and commitment can be documented in:

- minutes of boards of directors or boards of management;
- statements in strategic and business plans;
- management resolutions and directives;
- budgets, business cases; and
- 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 highest.

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 needs and expectations of external parties (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](#)); and
- e) organizational structure and delegations.

The records policy is a statement of intent and can include:

- 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 needs to include a commitment of the top management to:

- satisfy identified requirements of the organization (legal, business and other) and those of 30301; and
- continually improve the MSR.

The records policy should be drafted in a form that all people affected by the MSR can readily understand. The records policy should be a unique and short document and serve as a declaration from top management. It does not include a description of objectives, actions or records processes, controls and systems, which should be documented in other types of documents. In the implementation of records processes, controls and systems (see [Clause 8](#)), some operational decision documents are also called policies in some organizations.

The policy needs to be communicated within the organization and to interested parties. To communicate records policy, the organization can use the methods in [7.4](#).

Output

Documentation of the policy as a formal document is mandatory in order to conform with ISO 30301. 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 an MSR.

5.3 Organizational roles, responsibilities and authorities

MSR responsibilities and authorities are defined and assigned to appropriate roles by top management.

The main responsibility and authority to be assigned to a leadership role are to:

- ensure that the implementation of the MSR conforms with the requirements of ISO 30301; and
- report on the performance of the MSR to top management.

In some large organizations, there is a specific business unit for the implementation of management systems. In case of integrated management system implementation, a common leadership for all management standards can possibly facilitate the implementation.

Responsibilities can be assigned to different roles in the organization. The following guidelines can be used for the assignment of responsibilities:

- top management has the general responsibility of promoting the implementation and maintenance of the MSR, ensuring compliance with the requirements and promoting the awareness of the organization;
- programme managers have the responsibility for ensuring that the personnel of their units create and manage the documents in accordance with records policy;
- records professionals have the responsibility for designing records processes and controls, the implementation and maintenance of records systems, and the training of people on records processes, controls and systems;
- information technology professionals have the responsibility for the implementation and maintenance of records systems, including technological infrastructure, and all aspects related to technological aspects, particularly when records are exclusively created and managed in an electronic environment;
- systems administrators have the responsibility for ensuring that records systems are reliable, secure, compliant, comprehensive and manage records in a systematic manner, including during migration and changes; and
- all others who create and control records as part of their work have the responsibility to apply the records policy, procedures and instructions.

As for other management systems responsibilities for performance evaluation (including auditing) should be assigned (see [Clause 9](#)).

In a digital environment for records management the model for the roles and responsibilities should be aligned with roles normally used for information systems such as systems owners, systems users and systems designers. In this case, a multidisciplinary approach is needed. For example, when designing a records system, the record professionals, IT professionals and the expected users of a records system should co-operate.

If the organization lacks personnel dedicated to any of these roles, MSR responsibilities should be assigned to others capable to fulfil these roles.

For the MSR, a specific operational representative is assigned for directing the activities required for the operational implementation, reporting to top management on the effectiveness of the MSR, and establishing liaisons with external parties.

The operational representative should have specific records competencies as defined in [7.2](#).

Tasks to be directed by the operational representative are based mainly on those identified in ISO 30301:2019, 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 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 according to the records processes and controls in ISO 30301:2019, Annex A.

Liaison with external parties on MSR matters 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 leadership 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.

Responsibilities and authorities need to be 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.

Output

There is no specific requirement to document the assignment of responsibilities and authorities when implementing an MSR, but the organization would normally have a way to document them. The following are examples of ways to document:

- high-level responsibilities reflected in the records policy (see 5.2);
- documentation of the appointment of the leadership and the operational representative;
- job descriptions or similar statements;
- formal delegations of responsibilities; and
- a chapter in a manual or project plan relating to responsibilities for implementing an MSR.

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 an MSR requires risks to be identified, analysed and evaluated as part of planning for the MSR implementation. The analysis of the context (see 4.1) and understanding the needs and expectations of interested parties (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.

Establishing an 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. In this sense, an MSR is a risk prevention system.

The strategic opportunities associated with an 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 processes, cost effectiveness and efficiency, and strengthening stakeholder and client relationships. An MSR can 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 these kinds of risks and opportunities are normally done before the decision to implement an MSR as part of a general risk management framework.

When implementing an MSR, uncertainties in regard to achieving objectives are 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 an 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, records processes 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 can pose risks need to be considered in the strategic planning for an 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) technological infrastructure and security controls;
- d) human resources and skills to implement and maintain the MSR;
- e) budgetary or financial implications and changes;
- f) measurement and evaluation of achievement of policies, objectives and strategies;
- g) relationships with other management systems already implemented; and
- h) services provided by external parties.

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: 2019 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 planning to achieve them

Objectives of the implementation of an 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 records requirements (see [4.1](#));
- b) interested parties' needs and expectations (see [4.2](#));
- c) the records policy (see [5.2](#));
- d) the risk assessment and actions and priority areas identified to address those risks and opportunities (see [6.1](#)); and
- e) review of existing records processes, systems and controls.

Records objectives are specific to the organization [informed by the contextual analysis (see [Clause 4](#)) and risk assessment (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, records processes, controls and 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;
- 2) identifying where, when, how and by whom the actions are or should be undertaken; and
- 3) determining when the actions will be completed and how results will be evaluated.

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

- 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 an MSR and clarifies the roles and responsibilities within the organization needed for an MSR.

Output

Documentation of records objectives is mandatory in order to conform with ISO 30301. Examples of documentation include the following:

- a specific records objectives document;
- documented management approval of, and commitment to implement an MSR;
- a business case or equivalent; and
- one or more MSR project plans with key milestones.

7 Support

7.1 Resources

Planning for the establishment, implementation, maintenance and continual improvement 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 conduct of business. Resources can be temporary or permanent, external or internal.

Resources required for establishing, implementing and maintaining as well as continual improvement of an MSR can include the following:

- a) personnel – appropriate assigned responsibilities, numbers, levels and skills including periodic review of competencies and training;
- b) a sustainable technical infrastructure appropriate to the organization's need for records processes, systems and controls;
- c) financial resources; and
- d) facilities and logistics, e.g. to accommodate additional employees.

Output

There is no specific requirement to document allocation of resources, however, organizations usually create documents where resource allocation can be demonstrated:

- a) budgets;
- b) organization charts;
- c) statement of division of responsibilities;
- d) inventory of systems;
- e) facilities and other infrastructure required for the MSR; and
- f) contracts (e.g. for externally provided services).

7.2 Competence

Personnel need to be competent to perform their assigned roles in the MSR. This requires defining what competencies are required for employees and contractors and ensuring that competencies remain appropriate to the roles.

The competencies required for the persons doing work that affects the performance of records processes and systems can vary depending on the size and complexity of the organization, the roles and activities to be undertaken.

Competencies can be defined by appropriate education, training or experience or a combination of these.

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

The competencies required for personnel responsible for establishing, implementing, maintaining and continually improving records processes, systems and controls are 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 and permission rules;
- 4) designing and implementing systems to support records processes;
- 5) determining records disposition procedures, rules and implementing disposition; and
- 6) maintaining records systems.

The competency criteria apply 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 an MSR, records processes, systems and controls, 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) providing training to or mentoring of existing employees;
- ii) reassigning of currently employed persons;
- iii) hiring new employees; or
- iv) contracting of competent persons.

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

Documentation of evidence of competence is mandatory in order to conform with ISO 30301. An example of such documentation is employee records demonstrating education, training and experience, as well as providing definition of competences for each position.

7.3 Awareness

Strategies are required for building awareness of the records policy, the contribution of the personnel to the effectiveness of the MSR and the implications of not conforming with the MSR requirements.

Strategies for 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; and
- f) communication methods (see [7.4](#)).

Output

There is no specific requirement to document the implementation of requirements in this Clause. The following are examples of elements to demonstrate awareness:

- program design concept;
- instructional plan;
- administrative plan;
- program evaluation plan;
- program content;
- awareness materials, including instructor's notes and participant materials;
- program evaluation; and
- records of training attendance.

7.4 Communication

In determining what is relevant to communicate internally or externally, the organization should take into account what is necessary to ensure the effective implementation of the MSR. Communication about the MSR can be incorporated into existing communication strategies.

Strategies for communication about the MSR should include the following:

- a) what to communicate;
- b) time of communication;
- c) target audiences;
- d) responsibilities for communication; and
- e) methods of communication. Different messages and methods of communication can be required for different audiences.

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

- 1) the aim of the MSR;
- 2) the benefits of implementing an 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; and
- 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;
- business champions promoting the MSR message;
- briefings at regular business unit meetings; and
- newsletters and bulletin boards.

Methods for external communication about the MSR require a good understanding of who are the target audiences, the nature of their interest in the organization, and their actual or potential effect on the implementation and sustainability of the MSR (see 4.2). Where external organizations interact with the organization's routine processes, communication should cover the respective roles, rights and conditions for the affected records processes, controls and use of systems.

For example, it can be important to communicate with suppliers to enable their conformity with the requirements of the MSR. Where there are shared processes, another organization can require direct access to some of the organization's records systems.

Output

There is no specific requirement to document communication. However, some organizations can find it useful to document the communication strategy and evidence of the communication.

7.5 Documented information

7.5.1 General

Documented information is established, controlled and maintained to support the MSR. It includes the documented information required by ISO 30301 and information determined as necessary in order for the organization to operate.

Documented information of the planning, operation and control of the MSR processes is dependent on the scope of the MSR, the size and complexity of the organization and the competence of persons.

The required documented information to implement ISO 30301 is identified and explained in each clause. Specific documents such as policy are identified as requirements. Other documented information requirements are stated without defining a specific type of document, so can be met in different ways. When the term "determine" is used in 30301, requirements it does not mean that documented information is required. In these cases, it is the organization's decision whether or not to create documented information. See [Table 1](#).

Output

The content of [Table 1](#) shows the requirements in specific clauses of ISO 30301.

Table 1 — Documented information requirements

ISO 30301 Clause	Documented information	Content
4.1.1 Understanding the organization and its context	Not required	
4.1.2 Records requirements	Required	Business needs for records. Records requirements affecting the business operations
4.2 Needs and expectations of interested parties	Not required	
4.3 Scope of the MSR	Required	The scope and boundaries of the MSR
4.4 Management system for records	Not required	
5.1 Leadership and commitment	Not required	
5.2 Policy	Required	Records policy
5.3 Organization roles, responsibilities and authorities	Not required	
6.1 Actions to address risks and opportunities	Not required	
6.2 Records objectives and planning to achieve them	Required	Records objectives and planning
7.1 Resources	Not required	
7.2 Competence	Required	Evidence of competence
7.3 Awareness	Not required	
7.4 Communication	Not required	
7.5.1 Documented information, General	Not applicable	
7.5.2 Creating and updating documented information	Not applicable	
7.5.3 Control of documented information	Not applicable	
8.1 Operational planning and control	Not required	
8.2 Determining records to be created	Required	Analysis of the business processes and risk assessment
8.3 Designing and implementing records processes, controls and systems	Not required	

Table 1 (continued)

ISO 30301 Clause	Documented information	Content
9.1 Monitoring, measurement, analysis and evaluation	Required	Evidence of the results
9.2 Internal audit	Required	Evidence of the audit programme and results
9.3 Management review	Required	Evidence of the results
10.1 Nonconformities and corrective actions	Required	Evidence of nonconformities and corrective actions
10.2 Continual improvement	Not required	
A.1.1 Creating records	Not required	
A.1.2 Creating records	Required	Form and structure of the information required as records
A.1.3 Capturing records	Required	Methods of integrating the capture of records
A.1.4 Capturing records	Not required	
A.1.5 Capturing records	Not required	
A.1.6 Capturing records	Not required	
A.1.7 Records classification and indexing	Not required	
A.1.8 Storing records	Not required	
A.1.9 Use and reuse	Not required	
A.1.10 Use and reuse	Not required	
A.1.11 Migrating and converting records	Not required	
A.1.12 Migrating and converting records	Not required	
A.1.13 Migrating and converting records	Not required	
A.1.14 Disposition	Required	Criteria to determine retention periods
A.1.15 Disposition	Required	Decisions about disposition
A.1.16 Disposition	Required	Destruction of records
A.1.17 Disposition	Required - conditional	Control information about destroyed records
A.2.1 Metadata schemas for records	Required	Information needed to identify records
A.2.2 Metadata schemas for records	Required	Metadata elements for each work process
A.2.3 Metadata schemas for records	Required	Decisions about metadata
A.2.4 Business classification schemes	Required	Scheme or classification to link activities and records
A.2.5 Access and permissions rules	Required	Rules for access to records
A.2.6 Access and permissions rules	Not required	
A.2.7 Access and permissions rules	Not required	
A.2.8 Disposition authorities	Required	Decision about retention and disposition
A.2.9 Disposition authorities	Required	Retention and disposition schedules
A.3.1 Integrity / security	Not required	
A.3.2 Technologies	Required	Selection and change of technologies

Table 1 (continued)

ISO 30301 Clause	Documented information	Content
A.3.3 Inventory	Required	Inventory of records systems
A.3.4 Documentation	Required	Implementation decision on records systems
A.3.5 Availability	Required	Availability of records systems
A.3.6 Integrity	Not required	
A.3.7 Monitoring	Required	Regular monitoring of the performance of records systems
A.3.8 Access	Required	Rules for access in order to undertake systems administration tasks

7.5.2 Creating and updating

Documented information should conform with the requirements for records processes and controls. For the creation and updating of appropriate documented information, ISO 30301 states three requirements: identification and description, format and media, and review and approval for suitability and adequacy.

Output

See [7.5.3](#)

7.5.3 Control of documented information

Documented information required by the MSR and arising from the design, implementation and maintenance of records processes, controls and systems are managed using the records processes and controls in ISO 30301:2019, Annex A. For the control of documented information, ISO 30301 states that the documented information needs to be available and adequately protected. The activities listed to be performed such as:

- distribution, access, retrieval and use;
- storage and preservation, including preservation of legibility;
- control of changes (e.g. version control); and
- retention and disposition

have the corresponding requirements in ISO 30301:2019, Annex A.

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, controls and systems.

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

Output

There is no specific requirement to document the control of documented information.

Some organizations can find it useful to have a documented information procedure that includes the type of documented information to be created, conventions for naming and coding the documented

information, the roles and responsibilities for drafting, reviewing and approving documented information, and the way to make it available. Forms or templates can be established for any kind of documented information.

8 Operation

8.1 Operational planning and control

Organizations plan, implement and control the records processes to meet the records requirements (4.1.2) and to implement actions to address the risks and opportunities identified in 6.1. Records processes are implemented in records systems using the records controls.

Operational planning includes determining the records processes, records systems and records controls to be implemented. The first step is to establish the criteria for performing the records processes. For example, the criteria can be that records processes are embedded in business processes and are performed automatically by business systems.

When determining the records processes, it is necessary to identify what kind of documented information is needed to demonstrate that each process is implemented as planned.

Inputs to operational planning and control are records requirements and actions to be taken to address risks and opportunities (see 6.1).

When any work 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 external providers.

The processes undertaken by external 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 requirement to document the planning and control. Each organization can describe at the level of detail needed, the criteria and the different activities, outcomes, people, and systems involved.

Apart from the results of analysis for each business process (8.2), it could be useful to describe a model or high-level view on how records processes, systems and controls are being implemented.

8.2 Determining records to be created

To determine what, when and how records are created and captured for each business process, the organization should perform an analysis of business processes in a systematic way. This analysis needs to take into account the records requirements determined in 4.2. This analysis is part of the appraisal process described in the ISO/TR 21946, which can be used as a reference. Also, for the details of how to perform the analysis of business processes from the records management point of view the ISO/TR 26122 can be used.

To determine the records to be created and captured for a particular business process, an assessment of the risks of not having records is a good approach. A general view of areas of uncertainty and risk assessment related with records creation is provided in ISO/TR 18128.

This analysis can be performed in different ways, but the results need to be documented and authorized by the top management. The selection of the analysis method should be in accordance with complexity and size of the organization.

Output

Documentation of the records to be created and captured is mandatory in order to conform with ISO 30301. Examples of how the analysis could be undertaken and documented are

- 1) flow diagrams of processes indicating record creation points;
- 2) a list of documents for any business process, and
- 3) a broad description of records created in business processes, documented in the procedures for each process.

Establishing a documented procedure for undertaking the analysis, including responsibilities and the approval process, could be a good way to ensure the analysis is always conducted consistently.

8.3 Designing and implementing records processes, controls and systems

Records processes, systems and controls are designed and implemented to meet the requirements of ISO 30301:2019, Annex A according to the organization's specific needs. 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.

Most organizations implementing the MSR will have existing records, records processes, systems and controls which should be reviewed using the MSR's general requirements and assessed against the requirements in ISO 30301:2019, Annex A. Review of existing records, records processes, systems and controls also contributes to determining records objectives (see 6.2) and operational planning and control.

When some specific requirements mandated in ISO 30301:2019, Annex A are not suitable for an organization, they are not mandatory to implement. However, the reasons justifying the decision should be identified and documented, as part of the design of records processes, systems and controls.

ISO 30301:2019, Annex A is organized in 3 blocks to facilitate the understanding of the requirements.

- 1) The first block (A.1) is about records processes. Include requirements for creating records, capturing records, classification and indexing, storing records, use and reuse, migrating and conversion and disposition.

Conformance with the requirements in ISO 30301:2019, Annex A does not mean records processes have to be implemented in the same way in each organization. Some of the requirements are about simple and basic actions to be performed in the specific records process and others are about documenting the way to perform the actions.

- 2) The second block (A.2) is about the records controls to be used for supporting the records processes. They are metadata schemas, business classification schemes, access and permission rules and disposition authorities.

Records controls are tools to improve the performance of records processes. Depending on the organization, these records controls could be very simple or could require a specific skill to create or maintain them. Records controls can be modified over time. Versions of records controls are documented information to be maintained.

Legal or business requirement for some organizations could include the mandatory use of an existing tool. For example, in some jurisdictions a common metadata schema for records is mandatory for organizations in the public sector. In others some existing tools could be reused as record controls. For example, a business process map could be used as business classification scheme.

- 3) The third block (A.3) is about record systems. There are high level requirements that could be applied to any information system.

Records systems conforming 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 16175-1 contains functional requirements for records systems based in software.

Where organizations have implemented an information security programme, whether or not based on ISO/IEC 27001, information security requirements are applicable to records systems.

Output

There is no specific requirement to document the design and implementation of records processes, controls and systems. The main output of this section is an organization working in a way that authoritative records are created and managed and are available when needed.

There is some mandatory documented information for supporting the implementation. The mandatory documented information to meet requirements in ISO 30301:2019, 8.3 and Annex A are:

- form and structure of records for each working process;
- methods of integrating the capture of records;
- migration of records to other organization or system;
- conversion of records formats;
- criteria to determine retention periods;
- decision about transfer, removal, or destruction of records;
- destruction of records;
- metadata schemas for records;
- business classification scheme;
- access and permission rules;
- disposition authorities;
- selection and changes of technology for managing records;
- inventory of records systems;
- implementation decision of records systems;
- availability of records systems;
- monitoring of records systems; and
- access rules for records systems.

Some organizations find it useful to document how a requirement is fulfilled by adding a column to Table A.1 of ISO 30301:2019, Annex A, explaining in a short text how the organization fulfils the requirement.

Examples of implementation used in different organizations for each of the blocks of requirements in ISO 30301:2019, Annex A are given in [Annex A](#).

9 Performance evaluation

9.1 Monitoring, measurement, analysis and evaluation

The organization evaluates the performance of the MSR. This supports the need for corrective action and continual improvement (see [10.1](#) and [10.2](#)).

The organization determines what needs to be monitored and measured by considering the following:

- 1) the level of business risk arising from inadequate records or records systems in specific areas of the organization;
- 2) the application of other management systems standards;
- 3) requirements of stakeholders;
- 4) legal and regulatory requirements; and
- 5) how recently new processes or systems were implemented in a business area.

The criteria for monitoring and measurement should be reviewed regularly and modified in response to any changes in the organization's context.

The methods for monitoring, measurement, analysis and evaluation will vary depending on what is being reviewed. These methods can be quantitative or qualitative. Methods can include the following:

- a) user surveys;
- b) checklists of questions;
- c) observation;
- d) collection and analysis of system usage statistics; and
- e) analysis of system operation data, e.g. downtime, crashes, loss of data.

When the monitoring and measuring are performed will also vary depending on what is being reviewed. For example:

- a large organization reviews specific business functions on a rotating basis;
- a small organization reviews the entire organization annually;
- an organization reviews 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 assessment; and
- reviewing is done at the completion of specific phases of MSR implementation.

The analysis and evaluation processes use the results from the monitoring and measurement, 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 improvements can be made. The analysis and evaluation of monitoring and measurement results should be done soon after each review. However, trend analysis or analysis for management reporting purposes which use accumulated results can be done according to operational needs, e.g. quarterly, annually.

The organization can establish, implement and maintain procedures for the monitoring, measurement and evaluation processes.

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

For evaluating the performance of records processes and systems and the effectiveness of the MSR the results of the monitoring and measurement are used. The results should be used together with the result of the internal audit (see [9.2](#)) and management review (see [9.3](#)).

Output:

Documentation of evidence of the results is mandatory in order to conform with ISO 30301. Examples of output obtained are as follows:

- 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 schedules;
- gap analyses, including list of actions;
- on-going monitoring data; and
- monitoring reports.

Additional documented information on how to perform the monitoring, measurement and analysis processes can be useful for the organization. Examples of this can be:

- criteria for monitoring and measurement; and
- monitoring, measurement, analysis and evaluation methods.

9.2 Internal audit

The organization determines the frequency of internal audits and undertakes them to review whether the MSR conforms to the requirements of ISO 30301 and its own internal 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, the audit can verify for example:

- a) the adequacy of documented information of the MSR, as well as the extent to which the documented information is reflected in practice (see [7.5](#));
- b) a records policy that is fit-for-purpose (see [5.2](#));
- c) records objectives that are achievable and meet current and immediate future business needs (see [6.2](#));
- d) the frequency of review of organizational context and responses to change (see [Clause 4](#));
- e) an appropriate level of resources allocated to maintain the MSR (see [7.1](#));
- f) the understanding of persons with designated roles and responsibilities;

- g) the adequacy of the support provided to maintain the MSR (see [7.1](#));
- h) whether records processes, controls and systems are implemented and maintained (see [Clause 8](#)); and
- i) results of the performance evaluation (see [9.1](#));
- j) results of the management review (see [9.3](#));
- k) the detection of nonconformities and the implementation of corrective actions (see [10.1](#))

Output

Documented information of evidence of the implementation of the audit programme and audit results is mandatory in order to conform with ISO 30301. The documented information consists of:

- Audit programme; and
- Internal audit report and supporting documentation.

Some organizations can find useful an internal audit documented procedure, 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 review of the MSR, rather than one focused on specific areas. However, particular attention can be given to areas of identified risk.

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) changes in applicable law and regulations.

The management review of the MSR can be conducted by reviewing:

- a) previous management reviews and action taken;
- b) any changes in the internal and external context that can affect the scope of the MSR or levels of organizational risk;
- c) previous monitoring and measurement results;
- d) previous internal audit results;
- e) nonconformity reports;
- f) corrective actions taken, arising from monitoring, measurement and audit; and
- g) 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;
- the contextual changes that can affect the MSR, such as regulatory changes, stakeholder input, or changes to organizational functions due to structural changes;
- the need for revision of records policy and/or objectives;
- the adequacy of resources and skills for the on-going maintenance and improvement of the MSR;
- the level of awareness and understanding of the MSR by employees and contractors and their requirements to conform to the records policy and objectives; and
- if the MSR has and will continue to achieve its intended outcomes.

Output

Documentation of the results of the management review is mandatory in order to conform with ISO 30301. Examples are:

- minutes of the reviewing session;
- a formal report of the reviewing.

Output of the review includes documentation of management's decisions and actions related to process improvement or overall improvement of the effectiveness of the MSR, as well as changes to the MSR. Changes can affect the records policy, records objectives or resources.

10 Improvement

10.1 Nonconformity and corrective actions

Nonconformities with the requirements of the MSR are identified and appropriate action is taken. The causes of the nonconformities are reviewed, and action taken, if necessary, to eliminate those causes in the future. Nonconformities are identified as a result of the following:

- a) monitoring and measurement (see [9.1](#));
- b) internal audits (see [9.2](#));
- c) management reviews (see [9.3](#)); and
- d) ad hoc reporting.

Nonconformities require the analysis of the causes which produce them. When needed, a corrective action needs to be implemented. Actions to control, contain or correct nonconformities will depend on the following:

- 1) the level of risk;
- 2) the extent of the effect of the nonconformity and its consequences; and
- 3) the availability of resources to take the necessary action.

Planning required for taking corrective action can include the following:

- i) assigning roles and responsibilities;