



Locating and collating records

Information Act Guideline

Locating records

Searching for records relating to an application can be a challenging and time-consuming activity. The task is certainly assisted by having a good records management system in place, and ensuring that it is diligently adhered to. However, even with the best system, the job of locating documents often has to be approached with some investigative flair.

(NB. For ease of explanation, the references below are to an applicant who is looking for information about an incident. Similar techniques can be applied whether the information sought is about an incident, a proposed development, a policy or any other information held by government.)

Preliminary inquiries

Contact the applicant. The first step for the Information Officer will often be to contact the applicant to find out more about the information he or she is seeking. The applicant may be able to give more details about the time and place of the incident, the names of any officers or third parties involved, or the date of correspondence they have received. All this information will help to identify the parameters for search, and possibly to narrow the scope of the application.

Contact the business unit. Frequently, it will also be useful for the Information Officer to contact a person in the relevant business unit of the organisation to find out about things like—

- the procedures normally adopted in responding to an incident of the type in which the applicant is interested;
- the types of records normally received or created in relation to such an incident;

- the business units and staff members who might hold relevant information;
- whether there are any electronic databases apart from the standard records management tools, on which relevant information may be held.

That information should assist the Information Officer to decide where it is appropriate to make searches and inquiries.

Electronic searches

Most organisations have at least one electronic records management system that enables searching by key-word. Searches should normally be conducted on each database where the presence of relevant information is considered possible. Searches should usually be conducted under a number of individual key-words or phrases (and combinations if reasonably possible).

For example, separate searches might be conducted under—

- the name of the applicant
- the address of the applicant
- the name of a nominated third party
- the name of a nominated officer in combination with a date range.

It is preferable not to confine initial searches too narrowly. For example, a person may recall that an incident took place on 5 July 1999 when it in fact occurred on 3 July. Adopting a reasonable date-range for a search will show that the organisation is making every effort to locate the information. Similarly, if searches are available that allow near matches or phonetic matches, they may assist in locating relevant documents.

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Search requests

In most cases, it will be necessary to request other officers within the organisation to make searches or inquiries.

Given the time constraints on making decisions, Information Officers will have to make it clear that responses are required within a fixed time.

Searches should be aimed to locate any records held by—

- the business unit/s
- the individual officers who were involved
- the supervisors involved
- any senior management involved.

Searches should extend to any—

- e-mails
- other computer records
- handwritten notes
- hardcopy or electronic diaries
- draft documents
- 'working' files or folders
- loose papers that may be relevant to the incident
- database entries.

Never underestimate the potential for loose papers to be left on desks or in drawers or in briefcases, or for people to forget to print out e-mails and file notes.

Records relevant to an incident should be included (at least for the purposes of assessment) even if an officer states that they were made for his or her own personal reference.

It is often useful to stress to officers at this stage that you are merely looking to locate documents that may be relevant. Issues about whether the records are 'government information', whether they fall within the terms of the application, and whether some or all of them are exempt information, still have to be decided.

Response to a request

Units or officers responding to a request should be required to provide—

(a) The records located.

This may be by way of either the original files and records or legible copies. The approach taken may vary depending on the circumstances. It would usually be preferable to obtain the original files, at least for initial inspection. However, in some cases, merely obtaining copies may be administratively acceptable and more convenient.

(b) A report on inquiries undertaken.

The report should include an explanation of the steps taken to locate documents, including details of any individual officers asked to locate documents and their responses. It should also include details of the time spent searching.

Further searches

Examination of located records will frequently point to the existence of other documents or to other areas that should be searched. For example, one letter may refer to a previous letter that has not been located. Or, a memorandum may refer to a meeting that took place between one business unit of the organisation and another on a particular date. In that case, it might be necessary to—

- (a) conduct further searches to find any records of the meeting within the first business unit; and
- (b) conduct inquiries within the other business unit to locate any records it holds of the meeting.

If it appears that there may be additional information that has not been located, it may be necessary to contact an individual officer who is no longer employed by the organisation, in order to ascertain their recollection of the records or types of records created in the individual case.

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Interpreting access applications

Once potentially relevant files or records are located, it will be necessary to examine them to establish which records or parts of records—

- comprise 'government information',
- that falls within the terms of the application.

When interpreting an application, an Information Officer should not take an overly critical or legalistic approach. Applications are made by members of the public who are not necessarily familiar with the type of information held by government or the way that government describes the information it holds.

If there is some doubt about the information the applicant wants, the Information Officer should discuss this with the applicant, if possible.

Identifying documents

Organisations frequently need to identify individual documents that have been dealt with in an application in order to—

- facilitate handling of larger applications;

- make the decision on access clearer;
- respond to reviews and complaints;
- confirm that access has (or has not) been granted to particular documents when a follow-up application is made.

Strategies for identifying documents include:

- numbering all pages sequentially so that an individual page can be quickly located;
- photocopying all relevant records and printing out all relevant computer records;
- photocopying edited records in the form they are disclosed;
- stamping records to indicate that they have been disclosed under the *Information Act* (or disclosed in edited form, or not disclosed, as the case may be);
- creating a schedule that lists identifying details for each document (and can also be used to summarise the decision).

Circumstances will vary but it will often be useful in more complex cases to adopt most or all of the above strategies.

Sample Schedule

| Description | Date | Page no. | Access | Exemption and matter deleted |
|-----------------------------------|---------|----------|---------|---|
| Letter Granger to Snape | 19/5/99 | 1-3 | Full | - |
| Memo Snape to Rimmer | 22/5/99 | 4 | Edited | s.56(1)(a) – Name and address of third party. |
| Letter H Dumpty & Assoc to Rimmer | 24/5/99 | 5-17 | Refused | s.49(d) – Legal advice |

NB. A Schedule in this form is not a substitute for a reasoned decision.

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This guideline is produced by the Information Commissioner to promote awareness and understanding about the *Information Act*. It is **not a substitute for the Act**. You should read the relevant provisions of the Act to see how it applies in any particular case. Any views expressed in this guideline about how the Act works are **preliminary** only. In every case, the Commissioner is open to argument by a member of the public or a public sector organisation that a different view should be taken.