



ISO/TC 46/SC 11/WG 8 "Management systems for records"

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Comparison ISO 30301:2011 versus ISO 30301:2019. Implementation consequences

Document type	Related content	Document date	Expected action
General document / Other		2021-01-10	COMMENT/REPLY by 2021-01-25

Description

Document to be uploaded to SC11 website

ISO 30301 editions comparison table

MAIN TEXT

CLAUSE/SUBCLAUSE*	ISO 30301:2011	ISO 30301:2019	Kind of change	Consequences for implementation
4 Context of the organization/ 4.1 Understanding of the organization and its context/ 4.1.1 General	(Former clause 4.1) The organization shall take in account external and internal factors. These shall be documented.	The organization shall determine external and internal issues that are relevant to its purpose and affect its ability to achieve the intended outcome.	Change of wording. Requirement removed	Documentation of external and internal issues is not mandatory, but if it is already done could be adequate to include in a Manual or other document.
4 Context of the organization/ 4.1 Understanding of the organization and its context/ 4.1.2 Records requirements	(Corresponds to former 4.2. Business, legal and other requirements) Shall take into account, identify, assess and document business, legal, regulatory and other requirements related to the creation and control of records.	The organization shall identify, assess and document: <ul style="list-style-type: none"> • the business need for records to understand what records should be created, captured and managed. • records requirements (business, legal, regulatory or other.) 	Change in requirement.	Introducing the need for records introduces “appraisal” at a strategic level (further explained in chapter 8.2). Implementation can include an appraisal process for each business process or a statement of the need for records and records requirements.
4 Context of the organization/ 4.2 Understanding the needs and expectations of interested parties	Non applicable.	The organization shall determine the interested parties and the requirements of these interested parties.	New requirement	This is a new requirement to fulfil. The organization need to identify which are the interested parties on the MSR. Documentation is not mandatory could be adequate to include interested parties and their requirements in a Manual or other document.

4 Context of the organization/ 4.3 Determining the scope of the MSR	The organization shall define and document the scope of the MSR.	The organization shall determine the boundaries and applicability of MSR. Scope shall be available as documented information.	Change of wording. Requirement removed	Requirement on control of outsources process is removed from the scope There is no practical change for implementation. The scope is to be drafted in a clear way in terms of applicability and boundaries. When the scope is being broadened, for example - an implementation based on business processes to be added to the scope, an updated list of what the scope includes might be maintained separately for practical purposes. The 2011 version speaks specifically to documenting outsourcing processes in the scope and ensuring control over them, but the removal of this specificity in wording does not affect implementation.
4 Context of the organization/4.4 Management system for records	No applicable	The organization shall establish, implement, maintain and continually improve an MSR.	New requirement	
5 Leadership/ 5.1 Leadership and commitment	Top management shall demonstrate commitment	Top management shall demonstrate leadership and commitment...	Change of wording	There is no practical change for implementation.
5 Leadership/ 5.2 Policy	Shall establish and documented a records policy	Shall establish and documented a records policy	Change of wording	There is no practical change for implementation
5 Leadership / 5.3	Corresponds to subclauses	Top management shall	Change in requirement.	There is not and specific representative

<p>Organization roles, responsibilities and authorities</p>	<p>5.3.1 General 5.3.2 management responsibilities 5.3.3. Operational responsibilities</p> <p>Leadership to implement the MSR shall be allocated to a specific representative of top management</p> <p>The organization's top management shall appoint a specific records operational representative who shall have a defined role, responsibility and authority</p>	<p>assign the responsibility and authority for relevant roles are assigned and communicated within the organization</p> <p>The organization's top management shall appoint a specific records operational representative who shall have a defined role, responsibility and authority</p>		<p>of top management, just an assignment of authority and responsibility. Records operational representative continue to be the same.</p> <p>Roles, responsibilities and authorities could remain the same.</p>
<p>6 Planning/ 6.1 Actions to address risks and opportunities</p>	<p>shall consider the issues referred to in 4.1 and the requirements referred to in 4.2 and determine the risks and opportunities that need to be addressed</p>	<p>The organization shall consider the issues referred to in 4.1 and the requirements referred to in 4.2 and determine the risks and opportunities that need to be addressed</p>	<p>Change of wording</p>	<p>There is not practical change for implementation</p>
<p>6 Planning/ 6.2 Records objectives and planning to achieve them</p>	<p>Top management shall ensure that records objectives are established and communicated for relevant functions and levels within the organization</p>	<p>The organization shall establish records objectives at relevant functions and levels. The organization shall retain documented information</p>	<p>Change of wording Requirement removed</p>	<p>The subject is now the organization rather than "top management"</p> <p>There is no practical change for implementation.</p>

	The organization shall retain documented information about the records objectives	about the records objectives		
7 Support/ 7.1 Resources	Top management shall allocate and maintain the resources needed for the MSR.	The organization shall determine and provide the resources needed for establishment, implementation, maintenance and continual improvement of the MSR.	Change of wording,	The subject is now the organization rather than "top management" There is no practical change for implementation.
7 Support/ 7.2 Competence	The organization shall: a) determine the necessary competence of person(s) doing work under its control that affects the performance of its records processes and systems; b) ensure that these persons are competent on the basis of appropriate education, training, and experience; c) where applicable, take actions to acquire the necessary competence and evaluate the effectiveness of the actions taken, and; d) retain appropriate documented information as	No changes	No changes	There is no practical change for implementation

	evidence of competence.			
7 Support/ 7.3 Awareness	<p>The organization shall ensure that its personnel are aware of...</p> <p>The organization shall establish an ongoing programme for training in records creation and control.</p>	Persons doing work under the organization control shall be aware of...	Requirements removed. Change of heading	This change includes the subject shifting from organization to persons. There is no longer a requirement of a specific training records programme. All of the training needs could be aligned with the general need and linked to competencies. It is not required to have specific training programmes, but if they exist the organization could continue to revise and keep current.
7 Support /7.4 Communication	<p>The organization shall establish, implement, document and maintain procedures for internal communication about the MSR and its records policy and objectives.</p> <p>Depending on the level of interaction with external parties such as contractors, customers and suppliers, communication may be in the form of high-level information about the MSR and its objectives or documentation of specific procedures.</p>	<p>The organization shall determine the internal and external communication relevant to the MSR including:</p> <ul style="list-style-type: none"> • on what it will communicate; • when to communicate; • with whom to communicate; • how to communicate. 	Change in requirement.	There is not a requirement of a specific procedure for communication, but still interesting to have a kind of instrument as a communication plan to establish these parameters. No differences between internal and external communication
7 Support/ 7.5 Documented information/7.5.1 General	The organization's MSR shall include authorized statements of:	The organization's MSR shall include:	Simplified requirement	The requirement for "procedures" has been eliminated in the 2019 version. Flexibility is the aim of the new drafting,

	<p>a) the scope of the MSR; b) the policy and objectives; c) the interdependence and relationships between the MSR and the other management systems in the organization or between organizations; d) documented procedures as required by this International Standard; e) documentation determined by the organization to be necessary to ensure the effective planning, operation and control of its processes</p>	<ul style="list-style-type: none"> — documented information as required by this document; — documented information determined by the organization as being necessary for the effectiveness of MSR. 		<p>so the organization decides about the kind of documented information and the form of it, except for the explicitly stated documented information in other clauses.</p>
<p>7 Support/ 7.5 Documented information/7.5.2 Creating and updating</p>	<p>No applicable</p>	<p>When creating and updating documented information the organization shall ensure appropriate</p> <ul style="list-style-type: none"> a) identification and description (e.g. a title, date, author, or reference number); b) format (e.g. language, software version, graphics) and media (e.g. paper, electronic); 	<p>New requirement</p>	<p>New requirements are introduced for documented information, but they meet the basic requirements issues for records management and are covered by requirements of 30301 Annex A. There is no practical change for implementation.</p>

		c) review and approval for suitability and adequacy		
7 Support/ 7.5 Documented information/7.5.3 Control of documented information	<p>Former 7.5.2 control of documentation.</p> <p>Documentation required by the MSR shall be controlled. A documented procedure shall define the controls needed to:</p> <p>A documented procedure shall define the controls needed to</p> <p>a) approve documentation for adequacy prior to issue, b) review, update and re-approve documentation, c) ensure that changes and the current revision status of documentation are identified, d) ensure that relevant versions of applicable documentation are available at points of use, e) ensure that documentation remains legible and readily identifiable, f) ensure that documentation of external</p>	<p>Documented information required by the MSR and by this document shall be controlled to ensure</p> <p>a) it is available and suitable for use, where and when it is needed;</p> <p>b) it is adequately protected (e.g. from loss of confidentiality, improper use, or loss of integrity).</p> <p>For the control of documented information, the organization shall address the following activities, as applicable</p> <ul style="list-style-type: none"> • distribution, access, retrieval and use; • storage and preservation, including preservation of legibility; • control of changes (e.g. version control); • retention and 	Change in requirement	<p>There is not a requirement for a specific procedure, but if the organization chooses it could be interesting to maintain for some kind of documented information (For example manual or procedures)</p> <p>Requirements for control are covered by requirements in Annex A.</p>

	origin is identified and its distribution controlled, and g) prevent the unintended use of obsolete documentation, and classify it as obsolete if it is retained for any purpose.	disposition.		
8 Operation/8.1 Operational planning and control	The organization shall determine, plan, implement and control those processes needed to address the risks and opportunities determined in 6.1 and to meet the requirements in 6.1.	The organization shall plan, implement and control the records processes needed to meet the requirements and to implement the actions determined in 6.1.	Change of wording	There is no practical change for implementation
8 Operation/ 8.2 Determining records to be created	Not applicable	The organization shall design determine what, when and how records shall be created and captured for each business process. This analysis shall be documented and authorized by the top management.	New requirement	Requirements have changed for this chapter, which is no more related to Annex A. Referring to the ISO/TR 26122, ISO/TR 21946 and ISO/TR 18128), this chapter is mainly about appraisal, understood as a central and prior activity. For implementation it could be very interesting to establish how the analysis is going to be performed. It could be written in a procedure, or another kind of document. The results of the analysis shall be documented. Examples could be

				Description of processes, Flow charts or dashboards It could be very interesting to include the result of the analysis in corporate tools as process maps, process databases, etc.
8 Operation/ 8.3 Records processes and systems	<p>Corresponds to clause 8. 2 Design of records processes.</p> <p>The organization shall design the records processes according to the following outline...</p>	The organization shall design and implement records processes, controls and systems taking into account the records requirements in 4.1.2 and Annex A.	Completely rewording to relate to 30301 Annex A	This chapter is related to Annex A. In practical implementations, all references to requirements in Annex A should be changed for the new orientation of processes, controls and systems.
9 Performance evaluation/ 9.1 Monitoring, measurement, analysis and evaluation	<p>Former clause 9.1 are divided in 3 subclauses for each task</p> <ul style="list-style-type: none"> - Monitored and measured - Evaluate - Asses <p>retain relevant documented information as evidence of the results</p>	<p>The organization shall determine:</p> <p>a) what needs to be monitored and measured;</p> <p>b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results;</p> <p>c) when the monitoring and measuring shall be performed;</p> <p>d) when the results from monitoring and measurement shall be</p>	Change of wording	<p>The new drafting more clear about what is expected. Implementation procedures for evaluation or any other instruments to guide the tasks to be done could be very interesting.</p> <p>What continue to be mandatory is to document the results. Could be an indicators board, or any other instrument.</p>

		<p>analysed and evaluated.</p> <p>The organization shall retain appropriate documented information as evidence of the results.</p> <p>The organization shall evaluate the performance of records processes and systems and the effectiveness of the MSR.</p>		
9 Performance evaluation/9.2 Internal audit	<p>The organization shall conduct internal audits at planned intervals in order to provide information to assist in the determination of whether the MSR</p> <p>The organization shall plan, establish, implement and maintain audit programme(s), taking into account the frequency, methods, responsibilities, planning requirements and reporting, while also taking into consideration the importance of the processes concerned and the results of previous audits;</p>	<p>Now split in 2 subclauses 9.2.1 about to requirement of having audits and 9.2.2 on how to conduct the audits trough the audit programme</p> <p>The organization shall conduct internal audits at planned intervals to provide information on whether the MSR</p> <p>The organization shall</p> <p>a) plan, establish, implement and maintain an audit programme(s), including the frequency, methods, responsibilities,</p>	Change of wording	There is not practical change for implementation

 retain documented information as evidence of the results.	planning requirements and reporting. The audit program shall take into consideration the importance of the processes concerned and the results of previous audits; e) retain documented information as evidence of the implementation of the audit programme and the audit results.		
9 Performance evaluation/9.3Management review	Top management shall review the organization's MSR, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness.	Top management shall review the organization's MSR, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness.	Change of wording	There is no practical change for implementation
10 Improvement/ 10.1 Nonconformity and corrective actions	The organization shall: - identify nonconformities...	When a non-conformity occurs, the organization shall: 	Change of wording	The 2019 version doesn't include the requirement of identification of non-conformities and assumes they are detected by performance evaluation or other methods. There is no practical

				change for implementation
10 Improvement/ 10.2 Continual improvement	The organization shall continually improve the effectiveness of the MSR through the use of the records policy, records objectives, audit results, analysis of data, corrective and preventive actions and management evaluation. Actions for improvement shall be prioritized according to the results of the risk assessment (see 6.1).	The organization shall continually improve the suitability, adequacy and effectiveness of the MSR.	Simplified requirement	The 2019 version contains a significant simplification of requirement and change of wording. WG8 is correcting the enumeration and non-consistent terminology. There is no practical change for implementation

*30301:2019 Clause number and title

ANNEX A

Annex A is structured in completely different sections.

ISO 30301:2011	ISO 30301:2019
<p>A.1 Creation</p> <p>A.1.1 Determining what, when and how records shall be created and captured for each business process</p> <p>A.1.2 Determining the content, context and control information (metadata) that shall be included in the records</p> <p>A.1.3 Deciding in what form and structure the records shall be created and captured</p> <p>A.1.4 Determining appropriate technologies for creating and capturing records</p> <p>A.2. Control</p> <p>A.2.1 Determining what control information (metadata) shall be created through the records processes and how it will be linked to the records and managed over time</p> <p>A.2.2 Establishing rules and conditions for use of records over time</p> <p>A.2.3 Maintaining the usability of the records over time</p> <p>A.2.4 Implementing authorized disposition of the records</p> <p>A.2.5 Establishing conditions for administration and maintenance of records systems</p>	<p>A.1 Records processes</p> <ul style="list-style-type: none"> - Creating records - Capturing records - Records classification and indexing - Storing records - Use and reuse - Migrating and converting records - Disposition <p>A.2 Records controls</p> <ul style="list-style-type: none"> - Metadata schemas for records - Business classification schemes - Access and permissions rules - Disposition authorities <p>A.3 Records systems</p> <ul style="list-style-type: none"> - Integrity / security - Technologies - Inventory - Documentation - Availability - Integrity - Monitoring - Access

Change of wording is applied to all requirements in Annex A, except for:

- Requirement removed: A.2.5.3 Changes in records systems, particularly exceptional operations (such as migration, integration of new requirements, computer technology change or discontinuation), shall be analysed, planned and implemented. Decisions made shall be documented. (this requirement is now implicit in other requirements)
- New requirement: A.1.6 Capturing records. When a record supersedes an existing one (updating), such as some of documented information, the new version shall indicate the obsolete one and the changes made.
- Requirements on determine the need for information (A.1.1.1) and determine requirements (A.1.1.2) moved to new clause 8.2 Determining records to be created.

Consequences for implementation: Control of versions for some kind of records need to be implemented. Normally it is used for manuals, procedures or documentation of records systems.

In the ISO 30301:2019 edition there are not Informative Annex B and C