

Evaluation of Procedures and Policies used in Controlling Personnel Records at University of Eldoret, Kenya

Jepleting Emily^{1*}, Ben Namande², Esau Mneria³

¹Master's Student, Department of Communication, Media and Information Science and Technology, Kisii University, Kenya

²Lecturer, Department of Communication, Media and Information Science, School of Information Science and Technology, Kisii University, Kenya

³Lecturer, Department of Management Sciences, School of Business and Economics, Maseno University, Kisumu, Kenya

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*Corresponding author: Jepleting Emily

Master's Student, Department of Communication, Media and Information Science and Technology, Kisii University, Kenya

Abstract

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The role records control is to ensure that records are available at the point of use, has up-to-date information, reliable, checked and have statutory requirements for records and documents that require access. Records control procedures define the role of personnel records by limiting staff numbers, monitoring performance and protecting the rights of individual staff. In Kenya, proper record-keeping is mandated in law. However, it has been noted that challenges of personnel records control in Kenyan universities are common, and with dire consequences. Therefore, the study investigated the personnel records control procedures and policies at University of Eldoret's Central Registry. Descriptive research design was adopted. The study targeted all the 10 employees of the Central Registry. Therefore, census sampling techniques were used to identify all the staff as respondents. Observation, interviews and questionnaires were used to collect data and results were presented by use of pie charts and bar graphs. Qualitative data was analysed thematically and presented in narrative form. The study found that the University of Eldoret's Central Registry has in place standardized personnel records control procedures. These procedures include file registration, file classification, file plans, foliating of records, file transit sheets, and records inventories. However, there was no file colour coding to ease identification and retrieval of files. Further, the Registry does not have records management policies in place. From the findings and conclusion, it is recommended that the Central Registry management should adopt colour coding as one of the main procedures for controlling records. Additionally, the University should develop a records control and management policy.

Keywords: Procedures, Policies, Controlling Personnel Records, University, Eldoret, Kenya.

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INTRODUCTION

Proper maintenance of personnel records is critical to an organization's ability to meet its objectives. This is especially important in contemporary workplaces characterized by increasing complexity, scrutiny, regulation and driven by information. In present-day technology-driven world, a major challenge is that of organizational records being altered, manipulated, overwritten, or destroyed resulting in other multiple losses. As such, proper policies and practices are needed to ensure the mass explosion of records generated in paper and electronic formats are stored reliably, accessed easily and disposed of effectively when no longer required. Proper record-keeping is crucial for the survival and efficient operation of the day-to-day business activities of an

organization [1]. Records control is of great value to other record-keeping functions, which involve using, storing and disposing of records. It seeks to identify and organize records produced within a record-keeping system so that they can be accessed easily, stored and retrieved for appropriate use by authorized persons for as long as they are required [1].

The International Records Management Trust (IRMT) [2] avers that it is the job of records managers to help ensure efficiency in the records management systems and procedures. If the same work can be completed using less inputs or resources, then efficiency has improved. Effectiveness can be elaborated in terms of what is achieved. Therefore, in the case of this paper, efficiency would be measured by how documents are stored in their complete form, with

proper policies and procedures to ensure their utmost safety. It is concerned with whether or not records controls are met. This means that the control of records is being done in full compliance with established standards. Information officers must ensure that this efficiency is realized. If a team member is putting much effort but not delivering what is expected, then they are not effective. Effectiveness is measured by setting out clear record-keeping procedures and policies cascaded into objectives and goals before the actual work of documentation starts. Efficiency and effectiveness of personnel records is thus achieved where there is evidence of compliance, transparency, access, retrieval and identification of security levels throughout the processes involved in personnel records creation, maintenance, use and disposal.

Procedures for Controlling Personnel Records

The role records control is to ensure that records are available at the point of use, has up-to-date information, reliable, checked and have statutory requirements for records and documents that require access [2]. The current Quality Management System Standard (ISO 9001:2015), which is a universal standard, ensures that all institutions are certified in provision of quality services [3]. It provides document control procedures, which states that a document control procedure shall be established to define the controls needed, namely to:

1. Approve documents for adequacy prior to use.
2. Review, update as necessary and reapprove documents.
3. Changes and the current revision status of documents are identified.
4. Documents remain legible and readily identifiable.
5. Relevant current versions of web browser are available at point of use.
6. Documents of external origin are identified and their movement monitored
7. Prevent the use of obsolete documents.
8. Apply suitable identifiers to the records if they are retained for any purpose such as legal.

Similarly, the British Columbia Institute of Technology [4] states that record-keepers have authority and legal responsibility to:

1. Maintain index and retrieval tools of office files through the directory of records.
2. Provide file folder labels to the directory of records in database, indicating the classification to which each file belongs.
3. File all incoming records into the record management system to support the business processes.
4. Use papers when needed and eliminate paper duplicates.
5. Conduct an annual purge of inactive records, and to destroy those no longer needed and

transfer them to semi-active storage or to archives.

6. Train other office staff on proper control measures pertaining security levels as some records are open or closed and to identify and retrieve the records.

Ngulube and Tafor [5] posit that in an institution where records are managed effectively, there is an efficient flow of information through the phases of their life-cycle, attain immediate benefits being able to utilize all available information resources for competitive advantage. However, in institutions where records are poorly managed, the flow of information through their life-cycle is retarded, chaotic and costly. In such institutions, information is difficult to retrieve and costly duplication of paperwork is a regular occurrence. The consequences of poor records management are a decrease in the efficiency of the institution and an increase of its operating costs. Many universities, and other institutions, have experienced financial losses, management wrangles, strikes and imminent closures due to poor record-keeping systems. As such, in the absence of strong control records management policies, procedures and systems, documents can easily be disorganized, concealed, lost, stolen, destroyed or distorted. Control procedures and steps should be developed to eliminate unnecessary duplicates, working copies that are no longer required and documents with no continuing values [6]. Mahama [7] advises institutions to adopt standard records control procedures to guide in designing a records classification system that facilitates efficient retrieval, disposal of records, training of records managers, records office staff and to equip them with the necessary skills to carry out their work efficiently.

Records control procedures define the role of personnel records by limiting staff numbers, monitoring performance and protecting the rights of individual staff. Quality procedures provide more detailed guidance on how to implement the control framework, which includes records retention schedule, organization flow charts, classification, record storage, backups, systems documentation, disaster prevention, and disposal procedures [8]. Kanzi [9] says that a records procedure manual is a more detailed document that guides officials in management of records. Wright [10] posits that organizations should define clear procedures for addressing exposure of electronic records to a variety of security breaches. He observes that many organizations end up paying fines or being punished for their inability to fulfil their obligations on information security. Accordingly, such procedures should not be static; they should be distributed to all records personnel who need to be trained on their application. Every institution is subject to laws and policies that govern how electronic records are created, captured and managed. Such procedures also define security precautions to prevent unauthorized access and

tampering. The safeguarding of records is not just meant to prevent damage or losses, but to ensure decisions made based on those records are valid [8].

Among the procedures and regulations that organizations are advised to apply to minimize security breaches on their records include the use of passwords and data encryption [11]. Levels of security and authorized access can be formalized for the organization through the use of passwords and sign-on identifiers. Similarly, information can be encrypted when stored or transmitted. Moreover, records should be secured from system failures and physical disasters. Therefore, an appropriate back-up system should be scheduled to an external hard drive or in the cloud. A disaster recovery plan should also be devised, adopted and implemented. Additionally, there is need to regulate the creation of records to avoid production of unnecessary duplication. Besides, it is important that information within and outside the institution is properly directed to the right people and users in an efficient and timely manner. As such, Abioye [12] acknowledges that records management is a specialized field because records professionals and archivists easily identify records that have enduring value, determine the formatting in which records will be transferred, copy or reformat the records to be transferred, prepare transfer documentation, transfer records and documentation to archival custody, confirm the successful transfer of records and delete the records from the source system.

In the United States, the Veterans' Health Administration [13] has a management control act that stipulates that records be created in accordance with procedures mandated. It further directs organizations to constantly assess their accounting and administrative controls to prevent waste, fraud and mismanagement. To this end, the United States Office of Personnel Management operating manual states that institutions and organizations can develop their own record-keeping procedures that suit their institutional goals and objectives. Organizations should not publish systems or records that wholly or partly duplicate existing records. It further directs that institutions should have personnel records management controls to ensure personnel records document human resource management activities, accurate and timely, protected against loss, unauthorized access, alteration, document the employment history of staff, can be located, when necessary, are retained and disposed of as required, secured against unauthorized access.

Organizations should develop and implement procedures to allow employees or their designated representative's access to official records. These procedures should ensure that the records remain the legally verifiable product of the institution at all times. Organizations must ensure those authorized to access personnel records understand how to apply restrictions on disclosure of information from systems to

unauthorized users, must guard against disclosure of personally identifying information (PII) belonging to someone other than the original client [14]. Institutions must review personnel files prior to providing access to the client and take appropriate action such as removal or concealment of other personally identifying information. The University of Wisconsin-Madison [15], in its archives and records management procedures, provides that proper records management helps the institution to meet its legal requirements by improving access to information, controlling the growth of records taking up valuable office space, minimizing operating costs, minimizing litigation risks, safeguarding vital information, supporting better management decisions, and preserving historical records.

In Kenya, proper record-keeping is mandated in law. Penal code number 63 section 361 Laws of Kenya says that any records officer or personnel who is the custodian of records kept in a register or records kept by lawful authority, knowingly permits illegal access, and to his knowledge knows that it is wrong to be made in the register, is guilty of felony and is liable to imprisonment for seven years [16]. Further, the penal code further states that records personnel officer who interferes with personal data of a subject data or infringes on the right of a person to privacy commits an offence and is liable, on conviction, to a fine not exceeding five hundred thousand shillings or to imprisonment for a term not exceeding two years, or both [17]. Additionally, altering, misrepresenting or concealing part of information disclosed to a person with a purpose to deceive is an offence and is liable to a fine of not more than two hundred thousand Kenyan shillings or imprisonment for not more than one year or both [18].

In a study, Omollo [19] found that the University of Nairobi protects its records against unauthorized access, unauthorized removal from their place of custody, leakage of information, malicious damage, exposure to physical, biological and chemical damage, technological obsolescence, and alteration, manipulation and loss. At the University of Eldoret, the Code of Conduct and Ethics Policy, in section 2.4(a) on 'Data', says that the bio data or personal information of employees is strictly confidential and records staff who have access to them shall not under any circumstances disclose or discuss them except as stipulated under the laws of Kenya. The policy adds that records staff shall not, without authorization, give out or share confidential information to other people where such people are not legitimately entitled to the information.

Records control procedures define various steps in management of records, such as registration, classification, language control/indexing, tracking and location, filing system, closing files, linking closed files

to a new file or new paths, and the tools for controlling personnel records [20].

Registration

The purpose of registration is to provide evidence that a record has been identified, captured, received, recorded and stored into a record keeping system. It involves recording brief descriptive information about the record and assigning the record unique identifier or pointer. It serves to ensure that records in the organization's custody are authentic. It is usually carried out at aggregate levels such as files or whole database. Registration links related records and provides more efficient control tool than individual. Information about file content includes the title of file, name, file number, and date created, home location, current location.

Classification

Classification of records is a powerful technique that helps organizations to work effectively [21]. Classifying records in a systematic and consistent way helps to improve their capture, retrieval, maintenance and disposal. The sensitive level and value of the records will determine how much security level will be deployed to protect it. Sensitive wording should be simple to understand and easy to apply. IRMT [6] avers that it is not advisable to make classification scheme complex. The institution must identify records staff who are authorized to access the confidential information. This is accomplished using the information resource policy.

Classification is captured at the file level. The title of the file reflects the institution activity and what is being documented. By classification, staff can see at a glance what records are contained in the file. When an officer creates or receive records, the officer must classify them in order to identify the correct file to which they must be attached or to identify that a new file is needed. In the United Nations procedures, Ki-moon [22] designates three levels of records classification, namely confidential strictly confidential, and unclassified. Confidential level refers to information or material whose unauthorized disclosure could reasonably be expected to cause damage to the work of the United Nations. Strictly confidential refers to information or material whose unauthorized disclosure could reasonably be expected to cause exceptionally grave damage to or impede the conduct of the work of United Nations. Lastly, unclassified entails information or material whose unauthorized disclosure could reasonably be expected not to cause damage to the work of the United Nations.

Language Control/ Indexing

This entails designing and using simpler language to control, title and index personnel records and files in custody. Huvila [23] says that an index is a direct guide (pointer) to the contents of given records.

The index entries are arranged in a known or searchable order. Using indices helps to ensure that classification terms are used consistently throughout a record-keeping system. For record keepers to have access to information they require, the right information must be planned, created, identified, described and indexed in such a way as to be available, understandable and useable over time. The main purpose of indexing is, therefore, to help users to find records when they need them. Indexing records is usually combined with the classification terms from thesaurus and used as search term that makes identification and searching of records easier and faster, which saves time during records retrieval.

Tracking and Location of Records

Records should be easy to locate or track and retrieve to support decision-making. Ngoepe [24] argues that the main purpose of tracking is to identify the movement so that the record-keepers know where personnel records are at any given time, to monitor their use, security and to maintain an auditable trail of records, especially access to records by legitimately entitled users. This is necessary to protect the value of personnel records and reduce risks, as it increases transparency, trust and reputation as evidence of decisions taken. Files are tracked by their labels and classification levels as they move across the decision chain-link. However, files should have a home or original location from which their movements are traced [25]. Documents' home location in record control systems includes the record store room, a filing cabinet, name of staff currently using them, among others. Therefore, any officer accessing and using official records must be accountable, transparent, of integrity, compliant with relevant regulations and must ensure availability of records when need arises. The personnel records control system should indicate the level of access restrictions applicable to each file. In Kenya, the Access to Information Act [25] states that some information may not be provided due to security restrictions. This information is classified as exempt, and such information can be withheld for up to thirty years, after which public institutions may make public such information.

Filing System and Closing Files

Staff that need access to specific personal information do not access only to records required to perform their duties. The personnel department can create a filing system that distinguishes categories of records held. Umar [26] notes that without filing, one would struggle to locate or trace a single required record.

Files should be closed when they become too bulky (paper) or when they contain a quantity of records that is making the finding of personnel records difficult. Paper files should not exceed 2.5cm thick and no more than 200 electronic records should be added to

a file [27]. Files should be closed at the end of a business activity, not in the middle. Where it is useful to manage records annually (appraisal) or by some date range, then the registry should include the date in the file title and open a new file once this date range has expired. In Kenya, the law directs that an office that collects or processes personal data shall not keep the data for a longer period than is provided under law or necessary to achieve the purposes for which the data was collected or processed; where an institution determines to correct or delete the data, it shall do so within a period of seven days and inform the data subject of the action taken within a period of seven days from the date of the action [17].

Moreover, a records officer should use personnel records control system to document the new paths of files [28]. The officer should not use path numbers, as this can be confusing. He or she should instead assign each file a new number. The relationship is shown by recording the number of any previous files when one is registering a new file, and by updating the information of closed file with a note of the subsequent file number. This makes it easier for users to find the whole information on particular business content for decision-making on the closed file in relation to a new file or records [28].

Tools for Controlling Personnel Records

The National Archives and Records Management Unit of the Government of Virgin Island [29] states that records office staff must be able to determine the location of every file for which they are responsible. In Kenya, it is required that an office that assigns unique identifiers to persons shall take all accepted steps to ensure that unique identifiers are assigned only to persons whose identity is clearly established [17]. This is achieved through various file control tools, such as file movement card, movement register, movement grid, transit sheet, transit ladder, file census, bring-up diaries, among others [29].

The file movement card indicates the title and number of every file. It is kept by the staff in a cabinet in exactly the same place, position and order as the file. Whenever a file leaves the registry, the date of issue, name of issuing officer and the name of the requisitioning officer is entered on the card, which is then placed on the shelf or cabinet in the exact place of the file. Once the file is indicated on the card, then entry is cancelled. The file movement register consists of a book that indicates the file reference and title, date issued, to who it is issued, and the date received back to registry. Some files have a pre-printed file movement grid. The grid has columns for the same or designation of the officer to whom the file is issued, the folio (for who to see) and the date the file goes out. The officer will initial in the appropriate column when he has dealt with the folio marked for him. Normally, the file is delivered to the last person named in grid.

File transit sheet shows the location of all the files opened by the records officer. They include security grading (if relevant), file reference number, file title, index headings (taken from file index), any previous or subsequent file numbers, the locations (to whom sent and on what date). Each file movement must be recorded on the transit ladder on the front of the file cover. This ladder records the same information that appears on the file transit sheet. It provides a record of all officers who have handled any particular file. When there is a doubt about the accuracy of the file movement of records, census may need to be carried out as frequent as once a week. Senior officers at times request that a file is brought to them on some specific future date, this happens when the officer is not ready to deal immediately with a matter marked to him in a file, instead of retaining such a file, the officer will make a bring up marks that is to say, indicate by means to a date when the file will be delivered in the future. The registry has to comply with such a request. The file is then delivered to the action officer on the indicated date first thing in the morning. Every file returned to the registry must be checked for bring-up request to before it is shelved.

Policies for Controlling Personnel Records

Good control of personnel records starts with developing policies, objectives, goals and priorities before records are created. Such policies provide a framework and structure for the institution's records management practices. In institutions of higher learning, records often suffer due to poor preservation and management. New South Wales State Archives and Records [30] notes that it is a good management practice for institutions to understand the regulatory framework, its subject users, its personnel records and to establish policies and communicate requirements to relevant action officers and managers. To effectively control personnel records and information, institutions must develop, implement and maintain a codified set of control policies and processes. This is especially important in the current millennium where personnel must no longer manage just paper-based records but also the proliferation of records in electronic format in conjunction with paper, microform and other formats [31].

A records control policy assists personnel records officers and archivists to control authentic and verifiable records in support of public accountability, transparency and good governance. An effective records management policy refers to an official document that guides management functions in an institution. Mampe and Kalusopa [32] posit that a records management policy is an official charter for performing all records management functions. They point out that policy should be clear and outline records management functions in relation to the organization's record-keeping requirements. Kanzi [9] avers that the

aim of the policy is to ensure that institutions capture, maintain and protect the corporate memory of decisions and transparency of actions undertaken. The policy should designate the responsible records officers, reference numbers, dates of disposal of records, the custodians, security levels and measures, evaluation and conclusions.

In New Zealand, the University of Otago [33] spells out a framework for the management of the University's records to ensure all records are accurate, complete, reliable, created, properly captured, maintained, accessible, stored and legally disposed of in accordance with legal requirements and indicates the responsibilities of records officers. The records policy must indicate how records are identified, captured and stored in a secure system. All the records staff in the organization should be properly inducted on the relevant policies. The policy also defines personnel records control procedures and objectives, namely to ensure accountability, transparency, integrity, compliance with rules, regulations and guidelines, in generation, use and disposal of both paper-based and electronic records.

Information Solution Group of the World Bank [34] recommends that organizational policies should be established to determine the placement of the records and archives institution and to organize systems for the effective and efficient service delivery of information and records management service. These policies also ensure appropriate linkages between the creation and management of information and the execution of the agency's functions. They establish information management standards, and identify those information systems and information technologies that require improvement or restructuring. Further, they establish standards for the use of information technologies, including computers and communication systems. Lastly, these policies, according to the World Bank, establish systems to ensure the security and physical protection of information and records.

The Government of Kenya [35], in its National Policy on Records Management (NPRM), mandates that all public organizations shall design and implement systems and procedures to ensure that accurate, accessible and reliable records are created and maintained. These systems and procedures cover mail management, records use and maintenance, records disposal, electronic records management, disaster management plan, and access control. Mail management entails receipt, registration, distribution, storage and dispatch of all incoming and outgoing mail. The NPRM recommends that such mail shall be controlled from a designated records management office (registry). Mails shall be filed, arranged and indexed in an appropriate manner for ease of access and retrieval. On records use and maintenance, NPRM advises organizations to ensure that records are

maintained and controlled to ensure adequate storage and protection in order to enhance efficiency. This should involve designing and implementing control procedures for tracking the movement of records, providing adequate and appropriate space and equipment for the storage of records, and establishing institutional records centres. Further, personnel records are required to dispose of records in accordance to the stipulated laws, regulations and guidelines. As NPRM mandates, destruction of valueless records shall be recorded, witnessed and certified by a responsible officer of the creating institution.

Government of Kenya [35] further mandates that electronic records management are subject to statutory and regulatory process that governs them throughout their life cycle. It also mandates public institutions to protect their records in all formats against unauthorized access, removal from their place of custody, leakage of information, mishandling, malicious damage, exposure to physical, biological and chemical damage, technological obsolescence and alteration, manipulation and loss. NPRM requires organizations to have disaster management plan, which identifies and gives special attention to sensitive records that could be used for continuity of a business in the event of a disaster. Further, it mandates that policies on access to records should be provided within the existing regulatory framework. The process of accessing information should be flexible enough to respect freedom of information requirements, provided that the guidelines provided in the government security manual is not contravened. It is thus the duty for an information officer to provide all information, however not supposed to provide information that should be disclosed (exempt information). The exempt information is that which may affect national security, affect the due process of the law, endanger the safety, health or life of a person, lead to unlawful invasion of a property, or affect professional confidentiality. According to the Commission on Administrative Justice [18], exempt information may be provided if subpoenaed by a court of law.

MATERIALS AND METHODS

The study was carried out at The University of Eldoret's Central Registry, which is the main point of storage for all the various categories of personnel records in the institution. The study adopted a descriptive research design. The main subject's targeted were the registry staffs who are the controllers and custodians of all personnel records generated by the institution. The entire population was ten, comprising six registry staff members working in the Central Registry and four senior administrators who are the users and consumers of the contents contained in the records. Therefore, all the six (6) clerks and four (4) senior administrators and the users of records formed the sample size. Census technique was applied because

of the small population. The data for the study was collected using a questionnaire, interviews and observation guide. Quantitative data from questionnaires was then coded, edited and captured into statistical package for social sciences (SPSS) computer software program and tabulated by use of descriptive statistics and presented in form of tables, pie charts and graphs. Meanwhile, qualitative data from interviews

and observation was analysed thematically and presented in narrative form.

RESULTS AND DISCUSSION

Records Control Procedures

The study sought to identify the records control procedures put in place by the University of Eldoret. The results were as presented in Table 1 below.

Table 1: Record Control Procedures /

Records control procedures	Percentage
File registration	50%
Availability of classification system	10%
Availability of file plan	10%
Foliating of records	10%
Availability of file transit sheets	10%
Availability of records inventory	10%

Source: Field Data (2021)

From the findings presented in Table 1 above, the research observed that there were records control procedures in place. There was registration (50%) of incoming and outgoing records in file and mail register. The University also has a classification system (10%), alphabetical, numerical, chronological, alpha-numerical and by subject. The institution also has a file plan (10%) in which documents are arranged and stored to facilitate efficient retrieval. The file plan is used for both current and paper based and current electronic correspondence system. This was in line with IRMT [6] recommendation that procedures should be established to eradicate unnecessary duplicates. It further stipulates that staff should be reminded to review the filing systems, local drives and not to use their personal drives for long-term storage of official corporate documents. The research observed that there was no colour coding of files. File colour coding saves time for access, retrieval and storage. Nevertheless, there was records inventory (10%) with complete and accurate listing of

records. Records were foliated (10%) indicating the order in which records were captured in the registry.

Overall, there was evidence that the Registry staff were knowledgeable and compliant with records control procedures. One of the interviewees stated thus: “Except for records pertaining to staff, which are numerically filed and managed manually, records are categorised according to subjects and filed according to subject indexing.” There was therefore evidence of clear records control procedures. This affirmed the findings of Abuki [36] that records control procedures and systems make it easy to locate and trace records or files to facilitate faster decision-making.

Records Management Policy

The research further sought to know if there were policies regarding record management in Central Registry at the University of Eldoret. Results were as presented in Figure 1 below.

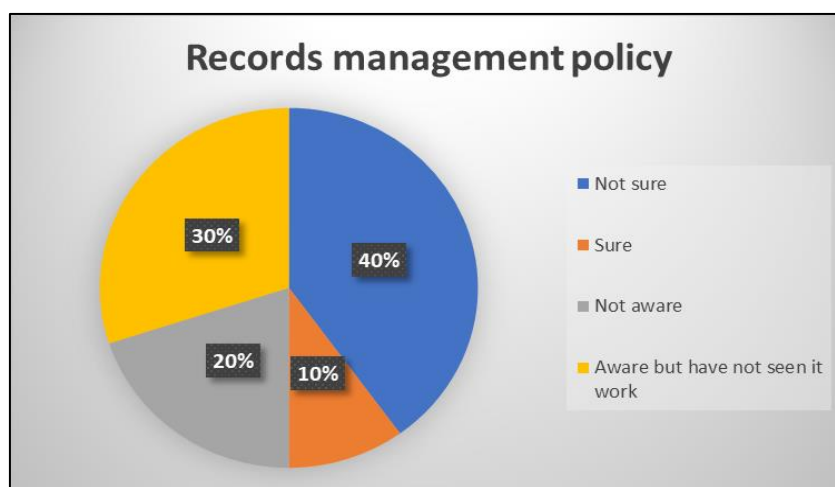


Figure 1: Records management policy

Source: Field data (2021)

As shown in Figure 1, 40% of respondents were not sure if records control policies existed while 10% were sure that such policies existed. It was also noted that 20% were not aware of any policies and 30% were aware but were in doubt since they had not seen such policies at work. It was observed that the University Central Registry lacked records control policies. This was confirmed by one of the respondents thus: “No policy or standard to define records management, retention and disposal in the University, poor filing, improper folioing caused by lack of adequate staff and has resulted in poor service delivery.”

The above findings reiterated those of Mwangi [37] who, in a study of record-keeping practices in Laikipia County Government, found no records management policies. Only 14(18.42%) said Laikipia County had records management procedures. However, the County Government did not have records management policies, according to all the interviewees. In order to manage their records, most interviewees (60%) said they had to design their own policies. Since there were no documented records management policies, the other 40% said they followed their superiors' orders. Having to write policies for numerous situations would be chaotic and improper record management. Nyotera and Muturi [38], in their study in Nyamira County Government, also reported that the key informants concurred that there were no clear records management policies in existence. Kemoni [39] observes that the absence of records management policies can render the work of public service providers difficult and inefficient.

CONCLUSION AND RECOMMENDATIONS

The University of Eldoret's Central Registry has in place standardized personnel records control procedures. These procedures include file registration, file classification, file plans, foliating of records, file transit sheets, and records inventories. However, there was no file colour coding to ease identification and retrieval of files. Further, the Registry does not have records management policies in place. From the findings and conclusion, it is recommended that the Central Registry management should adopt colour coding as one of the main procedures for controlling records. The Registry should also review and document their procedures properly and sensitize employees to apply them in records management. Additionally, the University should develop a records control and management policy. Such a policy should define the time frame, consistency and legal procedures for maintaining the institution's records, transferring records to inactive storage when appropriate and destroying records when no longer valuable to the organization.

REFERENCES

1. Swan, K., Cunningham, A., & Robertson, A. (2002). Establishing a high Standard for Electronic Records Management within the Australian Public Sector. *Management Journal Records*, 12(3), 79-86.
2. International Records Management Trust (IRMT) (1999). *Managing Public Sector Records: A Training Programme*. IRMT.
3. ISO 9001:2015. Clause 7.5: Quality Management System Standard.
4. British Columbia Institute of Technology (2011). *Record Management Procedure*. British Columbia Institute of Technology.
5. Ngulube, P., & Tafor, V. F. (2006). The management of public records and archives in the member countries of ESARBICA. *Journal of the Society of Archivists*, 27(1), 57-83.
6. International Records Management Trust (IRMT) (2009). Understanding the context of Electronic Records Management. Training in Electronic Management. IRMT.
7. Mahama, A. (2017). Challenges of records management in higher education in Ghana: The case of University for Development Studies. *International Journal of Educational Policy Research and Review*, 4(3), 29-41.
8. Franks, P. C. (2013). *Records and information management*. American Library Association.
9. Kanzi, N. (2010). *An investigation of the role of records management with specific reference to Amathole District Municipality* (Master's Thesis). Port Elizabeth: Nelson Mandela Metropolitan University.
10. Wright, T. (2013). Information culture in a government organization: Examining records management training and self-perceived competencies in compliance with a records management program. *Records Management Journal*, 23(1), 14-36.
11. Bandari, V. (2023). Enterprise Data Security Measures: A Comparative Review of Effectiveness and Risks Across Different Industries and Organization Types. *International Journal of Business Intelligence and Big Data Analytics*, 6(1), 1-11.
12. Abioye, A. A. (2006). *Records management practices of the Court of Appeal and the Supreme Court in the administration of justice in Nigeria* (Unpublished thesis). University of Ibadan.
13. Veterans' Health Administration, Washington DC 20420. (May, 2016). Department of Veterans Affairs.
14. McCallister, E. (2010). *Guide to protecting the confidentiality of personally identifiable information* (Vol. 800, No. 122). Diane Publishing.
15. University of Wisconsin (2015). *Archives and Records Management -10 step plan for organizing Records*. University of Wisconsin.

16. Government of Kenya (2012). *Penal Code [Rev. 2012]*. Nairobi: Government Printers.
17. Government of Kenya (2018). *Data Protection Bill, 2018*. Nairobi: Government Printers.
18. Commission on Administrative Justice (2016). *The Right to Access Information*. CAJ.
19. Omollo, B. (2010). *University of Nairobi Circular: Records Management Committee Issued by The DVC (A&F) on August, 2010*.
20. State Records New South Wales (2005). Strategies for Documenting Government Business: Doing DIRKS Project. Records Access and Security. Retrieved from <http://www.records.nsw.gov.au/publicsector/DIRKS/final/accessecurity.htm>
21. ISO15489:2001: Information and Documentation-Records Management Part1, General.
22. Ki-moon, B. (2007). *United Nations Secretariat Bulletin*. United Nations Publications.
23. Huvila, I. (2008). Participatory archive: towards decentralised curation, radical user orientation, and broader contextualisation of records management. *Archival Science*, 8, 15-36.
24. Ngoepe, M. S. (2008). *An exploration of Records Management Trends in the South African Public Sector. A case study of the Department of Provincial and Local Government* (MINF Thesis). University of South Africa, Pretoria.
25. Government of Kenya (2016). *Access to Information Act*. Nairobi: Government Printers.
26. Umar, I. (2005). Towards an integrated records management in professional associations and societies in Nigeria. *Lagos Journal of Library and Information Science*, 3(1), 72-76.
27. Australian Capital Territory (2018). *Records, Information and Data Procedures*. Australian Capital Territory.
28. Read, J., & Ginn, M. L. (2015). *Records Management*. Cengage Learning.
29. Government of Virgin Island (2007). *Records Management Procedures Manual for the Virgin Islands Public Service*. Records Management and Archives Unit Deputy Governor's Office Government of the British Virgin Islands.
30. New South Wales State Archives and Records (2013). *Standard on Managing a Records Management Program*. NSW.
31. International Records Management Trust (IRMT) (2007). *Managing the Creation, Use and Disposal of Electronic Records*. IRMT.
32. Mampe, G., & Kalusopa, T. (2012). Records management and service delivery: the case of Department of Corporate Services in the Ministry of Health in Botswana. *Journal of the South African Society of Archivists*, 45, 2-23.
33. University of Otago (2015). *New Zealand Records Management Policy*. University of Otago.
34. World Bank (2000). *Managing records as the basis for effective service delivery and public accountability: an Introduction to core principles for staff at the World Bank and its partners*. World Bank.
35. Government of Kenya (2009). *National Policy on Records Management (NPRM)*. Nairobi: Government Printers.
36. Abuki, B. J. (2014). *The Role of Records Management in Public Service Delivery in County Governments in Kenya: A Case Study of Kisii County Government Headquarters* (Doctoral dissertation). University of Nairobi.
37. Mwangi, W. G. (2017). *An Examination of Records Management Practices for Improved Service Delivery in Laikipia County Government, Kenya* (Doctoral Dissertation). Kisii University.
38. Nyotera, G. O., & Muturi, W. (2018). Challenges of Change Management in the Organization: A Case of Nyamira County Assembly in Kenya. *International Journals of Academics and Research*, 1(4), 118-125.
39. Kemoni, H. N. (2007). *Records Management Practice and Public Service Delivery in Kenya* (PhD Thesis), University of Kwa Zulu-Natal, Pietermaritzburg.