

Effectiveness of Records and Archives Legal and Regulatory Frameworks in Addressing Records Related Risks by Ministries in Kenya

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Abstract: Legislative and regulatory framework provides the basis for effective records and archives management. The enactment of comprehensive laws, policies rules and regulations are a critical prerequisite for successful records management regime. This paper presents the findings of the study which examined the legal and regulatory frameworks used in the management of public records in Kenya and their effectiveness. The aim of the study was to assess the effectiveness of the existing records and archives related laws in addressing records related risks in government ministries in Kenya. The current study was carried out with the assumption that the public records and archives legislation was the overall law that guides the management and preservation of public records in Kenya. Government ministries were identified as research sites The Business-Driven Recordkeeping model and the Integrated Risk Management models were adopted for the study. The study used the survey research design, which was primarily qualitative with some aspects of quantitative approaches to gather data. Data was collected through interviews and documentary review. The population consisted of 290, out of which a sample of 130 respondents comprising 90 Records Management Officers, 8 Archivists and 32 informants was drawn. The study shows that the legal and regulatory frameworks for records management did not effectively address records related risks and recommends the Public Archives and Documentation Service Act to be revised to provide for the management of records throughout their life cycle and incorporate electronic records management.

Keywords: Effectiveness, Legal and regulatory frameworks, records and archives.

INTRODUCTION

Public records are national assets and are essential to government transparency and accountability. Citizens and other users should have confidence in the integrity, authenticity and reliability of public records [1]. Towards this ideal government of Kenya need to put in place a number of laws and regulations to govern the creation, maintenance and disposal of public records. Records management related laws and regulatory frameworks ensure that government employees document their actions and those of government and retain the records in a usable format for as long as necessary and ensure the preservation and availability of permanent records [2]. Without an organized legal and regulatory framework there would be a deficit in records and archives management. Records and archival legal and regulatory framework therefore have a direct impact on ways in which government create, maintain and dispose of public records. This study is carried on the premise that discussions on records and archival legislations should also focus on the role of national archives in relation to public records management. The National Archives

should have statutory responsibility for the whole range of records management functions or task of formulating standards for records management systems and provide advisory service.

LITERATURE REVIEW

This section presents a review of literature of various studies on records and archives management related legislations. Generally, the studies identify general or abstract principles of records and archives management laws. Goh [3] points out that, past studies conducted on records and archives legislation focused on broad principles that are applicable across various juridical, social, cultural and political contexts. Ropper [4] also notes that the socio-political, economic and cultural context of each country and the general level of records and archival development shape the form of records and archives law. Similarly, Parer [5] argues that records and archival legislation of each country is dependent on the general political, economic, social, cultural and administrative environment.

Legal and Regulatory framework for recordkeeping

Legislative and regulatory framework provides the basis for effective records and archives management. The enactment of comprehensive legal and regulatory framework is a critical prerequisite for effective records management [6]. Public organizations need to be aware of the legal and regulatory environment that affects recordkeeping. According to Giddens [7] legal and regulatory framework is fundamental to effective records management, because, some legislations specifies the requirement to create and retain certain records, while other legislations show how long records should be retained.

Public records are national assets and are essential to government transparency and accountability. The citizens and other users such as researchers must have confidence in the integrity, authenticity and reliability of public records. Towards this ideal a number of laws and regulations need to be put in place to govern the creation, maintenance and disposal of public records. According to NARA [8] records management related laws and regulatory frameworks ensure that government employees document their actions and those of government and retain the records in a usable format for as long as necessary and ensure the preservation and availability of permanent records. Tashakkori and Creswell [9] argue that without an organized legal and regulatory framework there would be a deficit in records and archives management. Laws have a direct impact on ways in which government create, maintain and dispose of records.

Giddens [10] pointed out that in addition to legislative framework it is important for government to establish policies and regulations under which records are managed. Records management best practice means that organizations should provide adequate evidence of compliance with the regulatory environment. These are usually statutes, mandatory standards practices, code of best practice and code of conduct and ethics. The nature of the organization and sectors determine the regulatory elements (ISO 15489- 2001).

McLeod and Hare [11] argue that while some laws and regulations contain explicit records management requirements, many more contain implicit requirements for recordkeeping. According to Palmer [12], the records and archives legislation may be composed of both primary and secondary legislation. Parliament or some other supreme legislative authority enacts primary legislation. A minister under powers conferred by the primary legislation usually promulgates the secondary legislation. Records and archives legal and regulatory framework determine the manner in which government bodies address records related issues. However, Hughes[13] noted, legal and

regulatory structures do no guarantee success for effective records and archives management, but they are essential prerequisite of effective records and archives management.

Palmer [14] distinguishes between law and regulation. Law is a form of primary legislation that is enacted by parliament or some other supreme legislative authority, whereas regulation is a form of secondary legislation and is usually passed by a Minister under powers conferred by the primary legislation. Public organizations need to be aware of the relevant laws, regulations and best practices that apply to records and archives management to be able to manage their records effectively.

According to Broadzicz [15] archival legislation of each country is dependent on the legal context and the specific cultural, economic and political realities. Adina[16]also noted that the socio-political, economic, and cultural context of each country, the existing records and archives legislation and the general level of records and archival development shape the form of the records and archives law. Similarly,Palmer[17]recognized that archival legislation of each country is dependent on the general political, economic, social, cultural and administrative environment, the existing records and archives legislation and general level of records and archival development.

Archival legislation in most of the commonwealth countries provides the national archives with the statutory mandate to manage and preserve government records. However, as Glesne [18] pointed out majority of these legislations lags behind advances in technology and are not robust enough to support the management and preservation of records in all formats.

Archival legislation should outline the roles and responsibilities an archives has to public records management, but as Palmer[19] asserted only in a few acts specify the responsibilities that a public body has to public records the create and hold. An exception is the Queensland Act of 1999, whichstates, “A public authority is responsible for ensuring the safe custody and preservation of records in its possession”. The Act also states that public authority must make and keep full and accurate records of its activities and take all reasonable steps to comply with any relevant policy and standards set or guidelines issued by the archivist about the making and keeping of public records.

Closely related to the issue of the role of the national archives in records management is the organizational placement of the national archives in the government bureaucracy. Most studies according to Glesne[20] postulates that the national archives should

ideally be placed in a ministry with influence and authority. Ambira [21] stated that only placement at the highest level of authority can give the archival administration a sufficient degree of legal and administrative effectiveness. One of the earliest studies on legislation related to public records and archives conducted by UNESCO [25] stated that the statutory basis of the relationship of the National Archives to government departments and other public bodies determine the success of a public archives policy. The UNESCO study recommended that the national archives placed and report to a Minister who has a considerable degree of inter-ministerial influence or authority so that it can play a more active role in records management.

In addition, the national archives should ideally be placed within government administration which prevents competing interest and eliminate blurring of functions with other professional agencies and discipline. According to Australia, AS8000 [22] the reporting of the national archives is dependent on whether the national archives wants to emphasize its heritage and cultural role or the recordkeeping role

Records and archives legal and regulatory framework in Kenya

According to Willis [23] governments around the world are steadily issuing laws and regulations concerning records and archives management. In Kenya, a number of legislations have been enacted that affect records management. To address the study objectives on legal and regulatory environment in Kenya, this section provides a review of various legal and regulatory frameworks that affected the management of public records in the country. In reality as indicated by the Kemoni [24] virtually every piece of legislation created by the government has recordkeeping implications. However, for this study only legislations that had direct influence on how ministries created, used and disposed of records were reviewed.

Constitution of Kenya 2010

The Kenya Constitution 2010 is the supreme law of the Republic of Kenya. The 2010 edition replaced the 1963 independence constitution. The broader CoK 2010 and related records, information and archives legal and regulatory frameworks provide the basis for sound records and information management. The constitution has several articles that influence the creation, access, used and disposal of records. Freedom of expression including the right to access, receive and impart information is enshrined in the constitution.

In Kenya, the right to privacy and right to be informed and to access and disseminate information are provided in Articles 31 and 35 of CoK 2010. Article 31

(c) & (d) under Privacy, states that people have a right to privacy, which includes the right not to have information relating to their family or private affairs revealed or the privacy of their communications infringed. Article 35 under Access to information states that every citizen has a right of access to information held by the state or by information held by another person.

Additionally, every person has the right to correction or deletion of untrue or misleading information that affects the person. It further requires the State to publish and publicize any information affecting the nation. Article 33 (1) (a) on Freedom of Expression states that every person has the freedom to seek, receive or impart information or ideas. Article 24 (1) & (2) under Limitations of Rights and Fundamental Freedoms allows limitations of rights and fundamental freedoms where it is reasonable and justifiable. Chapter Thirteen on the Public Service Article 232 (1) (f) under Values and Principles of the Public Service provides for transparency in the provision of timely and accurate information to the public.

RESULTS

Legal and regulatory framework facilitates the effective management of public records. The study investigated the existence of legislations, policies and regulations relating to recordkeeping and their effectiveness.

Legal frameworks relating to records management

The researcher asked respondents to identify various laws that governed the management of public records and archives in Kenya. Majority of the respondents identified the Public Archives and Documentation Service Act Cap 19, Records Disposal Act Cap 14, Access to Information Act No. 31 of 2016, Public Finance Management No. 18 of 2012, Constitution of Kenya 2010. Judging from the responses and document analysis the study established that the Public Archives and Documentation Service Act Cap 19 of 1965 revised 2012 was the primary law for the management of public records in Kenya. The act provided the National Archives with statutory mandate to manage and preserve government records.

Majority of the interviewees however, raised concern on the adequacy of the legal and regulatory systems in Kenya. The respondents indicated that Cap 19 lacked sufficient rigor to enable the KNADS and ministries to manage and preserve records throughout their entire life cycle. The respondents were of the opinion that Cap 19 focused more on preservation of archives but provided very little direction and clarity on the creation and maintenance of records. The act did not provide guidelines on the management of records during their entire life cycle. All the 80 (100%) RMOs

pointed that Cap 19 did not give ministries and departments sufficient authority and direction in regard to the management of current records. The RMOs opined that *“the act was more archives focused and ignored records management.”*

All the four (100%) respondents from the national archives were of the opinion that Cap 19 was “permissive in nature, because if failed to impose statutory obligation on the roles and responsibilities of creating agencies on recordkeeping”. The respondents further indicated that “the act was particularly silent about the roles and responsibilities of public officers to create and preserve such records as are necessary to document adequately their policies, decisions, procedures, transactions and other pertinent to the implementation of their mandate and ensure that records in their custody, including those held in electronic form, were maintained in good order and condition”. The study established that failure by Cap 19 to provide individual officers responsibilities to document their work the ministries were at risk of creating and capturing records.

The study assessed the adequacy of Cap 19 was in the creation, management and preservation of electronic records by government ministries in Kenya. The study established that although the Act was supposed to provided for the management of all public records regardless of their format it did not have specific provisions for electronic records. The study established that although there was increased creation of electronic records in government ministries and departments the government had not changed the records and archives legislation framework to provide for the management of electronic records. The response of one of the interviewees captured the actual situation who stated that “the Act was conceived in an analogue environment where almost all the records that were created and preserved by government agencies were in paper format”.

The study established that the existing provisions in Cap 19 were insufficient in the management of electronic records. Another respondent from KNADS argued that “the Public Archives Act was conceived in an analogue environment where majority of the records were paper. The existing provisions of Cap 19 were therefore insufficient in the management of electronic records to ensure the reliability and authenticity of records created in a digital environment”.

Records management policies, standards and procedures

The study acknowledges that in order for records management prommes to succeed governments need to develop end implement adequate policies, standards and procedures to guide the management of public records.

The study sought to ascertain whether the selected ministries had formal records management policies, standards and procedures. Firstly, the respondents were asked if they were aware of any formal instruments such as policies and regulations that guided records management in their respective ministries. are one of the key determining factor to mitigate against records related risks.

Out of all 130 respondents 40 (30.77%) respondent yes, 20 (15.38%) responded no, while the rest did not give any response. At the national level, the findings of the present study revealed that Kenya did not have a formal national records management policy. Further inquiry on the same revealed that although it was the manadate of the national archives to to take lead on issues of records management policy development in the country it was the directorate of records management under the ministry of sports culture and the art that was spear heading the process. The study established that failure of the National archives to take its legal manadate in advising government ministries in records management was the major caused of inadequate records management policies and guidelines. Majority of the respondents blamed the absence of the national records management policy and ministerial policies on KNADS. The researcher however, established that there was a draft national records management policy developed by KNADS in 2009.

At the ministerial level the study revealed that, only 2 (25%) of the eight selected ministries had ministerial records management policies. However, all the 113 (100%) respondents interviewed were in agreement that records management policies were key in efficient records and archives and risk management. An Assistant Director in charge of records management activities at KNADS pointd out that *“the development of a comprehensive records management policy in the public sector will ensure that records are protected against risks in the life cycle.”*

The researcher also noted that majority of the ministries had constituted Records Management Committees with the responsibility develop ministerial records mangement policies for their respective ministries. In regard to these development the Director KNADS indicated that, *“majority of the ministries were likely to have developed records management policies by 2019”*.

When asked whether ministerial records mangement policies were important, all the respondents agreed that, *“having a records management policy was an important component for the success of any records management programme”*. The officer In-charge of records

management in one of the ministries further stated that:

...a records management policy was an important tool for the succes of records management in the ministry. Having a policy in place will enable the ministry to allocate resources for records management. It will also enable the minstry to address records management risks from a ministerial point of view and not just the records management unit alone”.

In another ministry the Head of records management unit lameted thay; *“I even wonder how as a country and ministries we continue operating without national and ministerial records management policies. The ministries can be willing to develop their own records management policies, but It will be difficult to have ministerial records management policy without first developing a national records management policy”.*

The current study established that absence or inadequate national as well as ministerial records management policies in Kenya was an hinderance to effective records management in government ministries. This was evident from the response of all respondents who were in agreement that the absence of records management policies in the ministries contributed to poor recordkeeping and therefore exposing records to various types of risks. Failure by government to develop and implement records management policy resulted to lack of commitment by ministries to address recordkeeping risks in an wholistic approach.

Institutional framework Records Management in Government Ministries

Institutional framework and organizational structure provides records and archives management the scope and authority to address and enforce records and archival programmes adequately. To address this item, the current study assessed the reporting and placement of records and archives management in government organizational structures with aim of establishing how it influenced records related risk management. All the 8 (100%) ministries reported that they had functional records management units in compliance with Office of the Prime Minister Circular No. MSPS.1//3/5A VOL. VIII (98) of 23rd July, 2010 on *Establishment of Records Management Units in Ministries/ Departments.*

The study further established that all the ministries had had a person responsible for coordinating and overseeing the implementation of records management programmes. Majority of the Records Management Units were headed by Records Management officers, with a few (30%) headed by

Assistant Directors Records Management Officers Job Group “P”. The study established that this was in contrast with other departments or units within government ministries where heads of departments were in senior positions. Engaged management particularly at senior level critical for records management programmes success was inadequate in majority (70%) of the ministries surveyed.

When asked whether records management was adequately represented at ministerial policy and strategic meetings majority (98%) of the respondents answered in the negative. All the 130 (100%) respondents were further in agreement that the profile of records management was lowly placed in the public sector. All the 82 (100%) RMOs interviewed lamented, *“records management officers were not sufficiently placed at senior positions in the public sector to influence key decisions on records management.”* They felt that this had affected the development of records management policies as well as getting adequate funding.

The study also established that records management was considered a marginalized department were majority of employees did not prefer to be deployed at. Majority of the respondents pointed out that transfers and posting at the RMUs regarded as “Siberia” where officers with disciplinary cases were posted. Records management was considered as a last resort of positing as records management was held in low esteem in the public sector. A Director of human resource management remarked:

Usually officers are transferred to records management because they are underperforming or they are being punished. Furthermore, when there are cabinet changes, new Cabinet ministers bring their own staff and we are forced to transfer those who held key positions to records management.

The placement of Kenya National Archives and Documentation Service and the Directorate of Records Management within Ministry of Sports Culture and the Art (MOSCA) was identified as a major factor the undermined records management in Kenya. All the respondents agreed that MOSCA was not the appropriate ministry for records and archives management. The ministry lacked interest in understanding the role and mandate of archives and records management since the focus and interest of the ministry were in promoting sports and cultural heritage activities than records and archives management.

When asked to indicate the appropriate ministry for national archives and records management all the respondents were in generally agreement that

records and archives management should be placed under the Presidency. The respondents were of the opinion that since the Presidency had considerable degree of inter-ministerial influence and authority will enable the national archives and records management a suitable position to influence records management programmes across the ministries.

Due to the low placement of records and archives, the study revealed that records and archives management were placed too low in government hierarchy and lacked the political influence to adequately influence government decisions and policies in records management. The majority of the respondents opined that the low placement of records and archives management does not give them sufficient authority to adequately address and enforce records management programmes in the ministries.

This reflected the way in which records management was viewed in Government ministries, which provided clear indications that records management and more especially risk management were not considered a key area in the public sector.

Majority of 70 (60.34%) respondents attributed this situation to inadequate support by senior government management in providing sufficient funding for records management function, development of records management policy and procedures as well providing passable training and promotion to records management personnel. However, 46 (39.66%) respondents disagreed with this view and stated that the government had done much in support of records management. They attributed the challenges facing records management in the public sector to failure of RMOs and Archivists to articulate records management issues.

One respondent said:

...the problem is with RMOs who have failed to come up with new strategies of marketing records management and link records management to public service delivery and good governance.” Another respondent indicated, “How could the records management function attract more funding, training and support when the RMOs were pre-occupied with routine activities of document filing and retrieval while ignoring policy issues.

In the day-to-day management of records management, the study established that in all the 8 (100%) ministries records management was placed under the Administrative Support Services. Majority of the respondents 58(60%) indicated that the placement of the RMUs within the Administrative Support

Services in the ministries had a positive impact on records management. They argued that this placement made records management to receive the required attention and support.

However, the other 46 (40%) argued that placement of records management functions under Administrative Support Services had negative impact. This category of respondents were of the opinion that records management should be placed under the ICT directorate which had support or leverage from senior staff, giving records management the required attention and support in terms of training and financial support. All the 130 (100%) respondents were in agreement that National Records Management Directorate was not in the right ministry. One respondent said:

what is the connection between records management with sports and culture for the government to place records management in the Ministry of Sports Culture and the Art? This shows how the government does not appreciate the value of records and records management.

Legal and regulatory framework for records management in Kenya

This study considered formal instruments such as policies, procedures and regulations as key determining factors for successful risk management for public records in Kenya. To answer this objective the study sought to assess the adequacy of various legal and regulatory framework used in the management public records in Kenya in mitigating records related risks in ministries. The study established none of the eight elected ministries had a records management policy and a risk management strategy for records. Respondents from KNADS pointed out that developing a records management policy was one of the key strategies that the ministries needed to put in place to improve records management in the public sector and more especially in addressing records risks.

The study further established that ministries were at different levels of developing records management policy. In one ministry, the study established that a Records Management Committee had been constituted with one of its terms of reference being to develop a records management policy for the ministry. The study however, established that the committee had not made any significant progress. The study established that the absence of national as well as ministerial records management policies had a negative impact on records management.

Records Classification Systems

The study sought to establish whether Government Ministries had developed file classification systems for the management of both paper and electronic records. The study considered this item to be important because classification systems are essential tools in ensuring that records created, received and maintained by the ministries were accounted for to minimise the risks of loss and misplacement. In this context, the study sought to establish if the selected ministries had file classification plans and whether the file plans had been approved by the Kenya national archives. The study further sought to ascertain whether the classification schemes used by the ministries were up to date and revised regularly to keep them up to date with changes in government.

The findings of the study revealed that all none of the 8(100%) ministries surveyed had file classification plans approved by KNADS. The study further established that majority majority of the file classification plans used were old and out dated. The findings also revealed that only 3(37.5%) ministries had revised their classification systems. Majority 5 (62.5%) of the ministries were in the process of revising the file classification systems.

The study identified failure by the ministries to revise and up date the file plan as an hinderance to effective records management. Majority of senior officers interviewed were concerned of failure of records management units to revise the classifical systems to *“align the records management functions and activities with the COK 2010 and the Executive order No. 2/213 of 2013 on the organization of government.”*

That the ministries had not revised the filing classification systems even after the changes brought about by the COK 2010. One respondent stated that:

Alot of changes have taken place in government over the last few years with alignment of ministries and departments, where new functions and activities have been introduced meaning that new classes of records have been created, but the file classsification systems used in the registries are yet to be revised or updated.

CONCLUSION AND RECOMMENDATIONS

The study established that inadequate and weak legal and regulatory frameworks contributed to poor records management in Kenyan government ministries. Laws and policies were considered important components for of effective records management, and the degree to which the selected ministries created and managed their records entirely depended on supportive legal and regulatory framework that were in place. The

study concluded that poor records management in Kenyan government ministries was as a resulut of the inadequacy of Cap 19 to provide for the management and preservation of public records throughout their entire life cycle. The study further concluded that development and implementation of records management laws, policies, procedures and standards would greatly enhance proper records management in the ministries. The study also concluded that failure by the Public Archives and Documentation Service Act to provide for the management of electronic records would affect the government's e-governance strategy as the electronic records key for the delivery of e-government services would not be readily available. The study recommends that;

- The Public Archives and Documentation Service Act should be revised to direct the National Archives to develop, approve and review advisory and mandatory standards and regulation for adequate and accurate recordkeeping and other management functions of records from creation to ultimate disposition to ensure their authenticity, integrity and usability.
- The directorate of e-Government should work consultation with KNADS and other records management professions in the procurement of electronic records management hardware and software in ensuring that the systems have records keeping functionalities.
- The Kenya National Archives and Documentation service to take lead in the development and implementation of the national records management policy, standards and procedures as mandated by the Public Archives Act.
- The ministries to use the national records management policy as a guiding document to develop ministerial records management policies.
- The research findings revealed that most of file classification systems used by the ministries were out dated and obsolete. The study recommends that the Principal Secretaries in liaison with Director KNADS to urgently revise existing files classification.

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