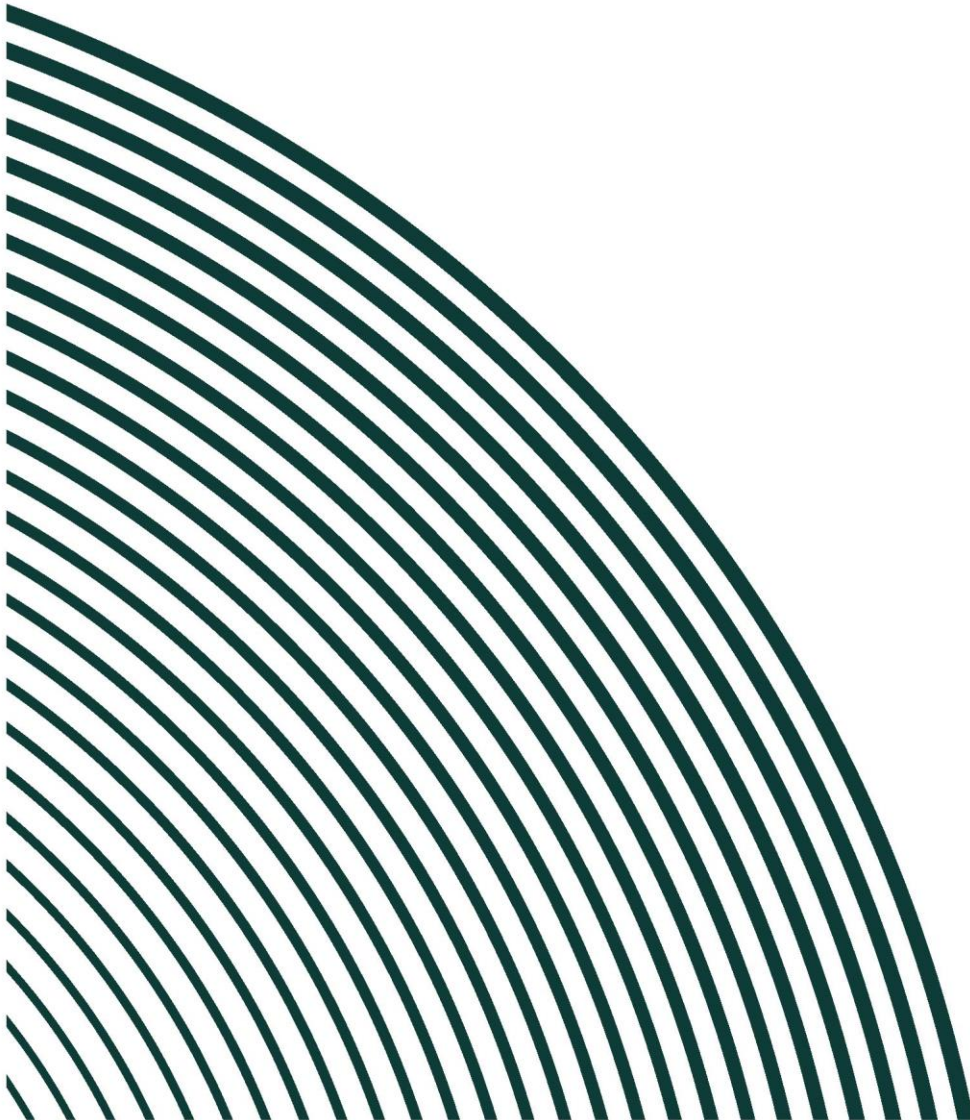




Police Service
of Northern Ireland

Guidance for Scanning

**Guidance for transferring hard copy records
into a digital format.**



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Introduction

In the context of this document, scanning is defined as the conversion of PSNI physical documents or records into digital format. It applies to everyone working in the PSNI and all new scanning projects must follow this guidance.

The purpose of this guidance is to provide PSNI with the basis required to conduct scanning projects. This will enable the PSNI to:

- Ensure the authenticity, reliability, integrity and availability of PSNI information;
- Comply with the relevant legislation;
- Provide legal admissibility, where necessary; and
- Represent the best value for money, considering short and long-term implications.

Scanning - Benefits and Risks

It is acknowledged that there is a role for the principles of scanning within the management of Service records. However, the scanning of paper records is time-consuming, may not be cost effective and should only be undertaken when there is a genuine business need, such as the need to:

- Create space by disposing of the original paper record; or
- Share the record on a regular basis between business areas located in different geographical locations.

There are many benefits to scanning, including:

- The ability to access and retrieve records quickly and efficiently;
- The ability to access information from multiple locations;
- A consistent approach to naming and cataloguing;
- Better control of access to sensitive information;
- Free text searching of text where the quality of the document is sufficient;
- Where appropriate, the ability to copy and paste sections into other documents;
- A reduction in cost of office storage for paper records; and

- The effective utilisation of resources.

There are also risks associated with scanning, including:

- Potential obsolescence of the digital media and technology used in the scanning; and
- The digitised information may not be legally admissible.

By following this guidance, it is accepted that these risks may be mitigated or reduced, and the benefits achieved.

Legislative and Regulatory Environment

Information is one of the PSNI's key assets and should be governed and managed effectively. Within the PSNI, information management is governed by numerous legislations including, but not exclusively, the Public Records Act (Northern Ireland) 1923, Data Protection Act 2018 (DPA), Environmental Information Regulations 2004 (EIR) and Freedom of Information Act 2000 (FOIA). Failure to comply with these obligations can lead to serious consequences.

Districts and Departments are required to adhere to any relevant legislation, regulations and standards, including the Electronic Communications Act 2000, Electronic Signatures Regulations 2002 and BS 10008:2020, the British Standard on the Evidential Weight and Legal Admissibility of Electronic Information. This guidance provides the basis for PSNI to conform to BS 10008:2020.

The Home Office have published guidance entitled [“Digital Imaging and Multimedia Procedure v3.0”](#). Whilst this focuses on records captured in a digital capacity from the outset, it provides further considerations for ensuring that evidential records are processed correctly, and the integrity of the material is maintained.

Scanning - Roles and Responsibilities

Information Asset Owners (IAOs) must recognise that Records and Information Management underpins transparency, accountability and good corporate governance. As each IAO's scanning requirements are unique, they must develop

and implement operational procedures, training and awareness, monitoring and auditing requirements, to comply with this guidance.

When an IAO is proposing to undertake a scanning project, officers and staff must engage with the relevant stakeholders such as the Data Protection Officer, Records Manager and Legal Services at the outset.

Any personnel, within a department, considering a scanning project must take into account this guidance and consult with the IAO to ensure that the business and legal needs are met. It is the responsibility of IAOs to approve the scanning of documents and to decide whether original documents are to be retained or destroyed.

All PSNI staff responsibilities, in relation to document and record scanning, are set out in this guidance. It is the responsibility of all staff involved in the scanning process to follow the agreed procedures for scanning.

It is the responsibility of all staff involved in the disposal process to ensure it is carried out in accordance with the principles of PSNI Retention & Disposal policies, and any originals are disposed of correctly according to their security level. Authorisation for the destruction of the paper originals following scanning needs to be obtained from the IAO.

It is the responsibility of all line managers to develop and implement operational procedures, and ensure that staff are made aware of the proper procedures to follow.

Scanning Process - Areas for consideration.

Benchmarking exercises have found that business led, rather than IT projects have had the best success rates in relation to digitisation, through careful consideration of the requirements of each business area. Regardless of the approach, quality assurance processes must be established and reviewed throughout.

It is important to consider the requirements for the document once it has been scanned, to ensure it can be used to its full potential. For example, will you need to search the document? What type of searching is required? Business areas may choose to use optical character recognition whenever scanning any documents, if the system permits.

Risk Assessment

In addition to adhering to the procedures, it is a requirement in any scanning project to undertake a risk assessment concerning the potential issues that may arise. Examples include the risk of a legal challenge, the risk of human error in the scanning process, the risk of technological failure & obsolescence, and the risk of alteration or manipulation of the scanned image. A proposed template for the risk exercise is included on pages 10-11.

There are a number of issues to be considered to ensure the scanned copy is of the highest standard required:

Preparation of Documents to be Scanned:

- An assessment of the robustness of documents to be digitised is required- quality of paper and age will be a consideration;
- Physical preparation of documents such as batching or removing staples should be estimated as part of the overall costs of the project;
- Care should be taken that appropriate information is recorded to link the image and its filename. There also needs to be a link to metadata as part of this process.

File formats must:

- Not be a proprietary format, where possible;
- Have published technical specification available, where possible;
- Be supported by standard software and an operating system employed within the PSNI, where possible;

- Be compatible with a viewing player, where possible.

Information must not be encoded into a form that can only be rendered comprehensible by particular software. Software is vulnerable to change in rapidly evolving technical environments. Consideration should not simply be given to immediate requirements but also long term considerations i.e. if a scanned record needs to be retained for 20, 40 or even 100 years, what are the implications of selecting a particular file format?

Metadata

Metadata is an important aspect of maintaining any record, but this is even truer of scanned images.

There are two types of metadata that are required to be captured with scanned documents, in order to manage, access and dispose of the documents in the future:

- Metadata about the image and the process that created it e.g. image identified, date of digitisation, resolution, dimensions etc;
- Metadata about the content e.g. accessibility, creator, date, disposal period etc.

Resolution

Must be of sufficient quality to meet the required uses of the scanned document. This will vary in accordance with use and end user input is an important aspect of the decision.

Compression

Where compression techniques are applied, consideration must be given to whether any data loss can occur because of the compression and if this has any bearing on

the legality of the record. This will depend on the function or intended use of the document, and the area of activity to which it relates.

Colour management

Consideration must be given to how good the image needs to be for the required use of the document.

Scan and Retain” and “Scan and destroy”

Careful consideration needs to be given to the distinction between “Scan and Retain” and “Scan and destroy”.

The distinction between, and the decision arising, will have both financial and potentially legal ramifications for the respective IAO and must be arrived at following careful consideration and consultation with relevant stakeholders who are likely to request access to records, both internal and external (for example Legal Services, PPS, and Police Ombudsman) at the outset to ensure compliance with BS 10008:2020.

- Scan and Destroy

Many documents and records used by the PSNI can potentially be required in support of litigation and submitted as evidence as part of legal or tribunal proceedings.

To ensure the correct ‘weight of evidence’ is attributed to these documents, it is important that extra measures are applied to the conversion of documents that have a high probability of being challenged in litigation.

Where scanning results in the disposal of the original record, care must be taken to adhere to the scanning standards set out in BS 10008:2020.

Scanned copies must be checked for quality before the original is disposed. The original must be retained if a:

- Scanned image of sufficient quality cannot be obtained;
- Scanned image requires significant enhancement;
- Record has physical amendments that have not been captured (e.g. pencil annotations that do not show up properly, or Post-It™ notes);
- Fraud is suspected;
- Legal reason(s) for retaining the original (e.g. required by contracts);
- Scan is of an exhibit (e.g. a hate-mail letter).

The destruction of the original documentation once it has been scanned can only take place if and when the respective IAO has approved this and staff have followed the correct processes in committing records to digital image.

- Scan and Retain

There may be some cases where certain stakeholders feel that it is essential to retain the paper original. In these cases, proper arrangements should be made to ensure the correct storage of the original document. Where the original is retained after scanning, the scanned version is nothing more than a “convenience copy” and scanning standards need not be so rigorously applied.

Project Type

In-House Project

The scanning of paper records is delivered from within the designated business area by a specific project team created either for the purpose or by individuals and teams as part of their daily activity.

The advantages to this approach are:

- Documents and records do not leave the departments;
- Minimum delay on conversion;
- Direct control over quality and accuracy;
- Third parties do not handle sensitively marked documents.

Disadvantages are:

- Initial cost of equipment and maintenance;
- Workload of staff designated to complete processing;

Outsourced Project

The work is allocated to an external agency though the PSNI procurement process.

The following are some advantages:

- Exact costs defined;
- Minimum management resource used;
- Can deal with large volumes;
- Expertise in image processing.

Disadvantages are:

- Security concerns for sensitive documents;
- Quality needs to be defined and monitored;
- The services required must be precisely defined.

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Risk Assessment template for the scanning of records and the destruction of their paper original.

This risk assessment concerns the proposal by (*name of business area*) to scan (*name of*) records, manage them in (*name of electronic system*), and destroy the paper originals. The risk assessments identified the various risks involved and outlined the steps taken to reduce the level of risk.

Date:

Name and Service Number of person completing:

Risk	Outline of risk	Comments	Risk Reduction Activity
Risk 1: Legal challenge to the legal admissibility of the scanned image after the destruction of the paper original	Risk that courts or other key stakeholders may not accept a scanned image as a true record, particularly after the destruction of the original paper record.		
Risk 2: Human error during the scanning process	Risk that a record may be scanned incorrectly or to a poor quality due to errors by a member of staff.		
Risk 3: Technological failure or obsolescence	Risk that technology fails resulting in the loss of the digital images with no paper counterpart or that technological/software changes makes the file format and technology obsolete.		
Risk 4: Alteration of the scanned image which would cause legal admissibility issues highlighted in risk 1	Risk that an employee digitally manipulates the scanned image and alters it in some way.		

This risk assessment will be reviewed by the Information Asset Owner after a period of one year.

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It is the opinion of the Information Asset Owner that the steps taken to reduce the levels of risk by (*name of business area*) are sufficient to allow for the scanning and destruction of original paper records. The procedure complies with BS10008:2020, which aims to maximise the legal admissibility and evidential weight of the scanned images.

Date:

Name and Service Number of IAO: