

# Managing Records in the Covid-19 Era at the Botswana Communications Regulatory Authority

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## Abstract

The Covid-19 pandemic caused businesses to re-evaluate the way in which to ensure effective information exchange, and the Botswana Communications Regulatory Authority was no exception. The Covid-19 lockdowns had such an impact on records management that the Botswana Communications Regulatory Authority moved its services online to enable access to information. This article discusses records management practices at the Botswana Communications Regulatory Authority during the pandemic, explores the challenges and threats of managing records during the pandemic as experienced by the organisation's records curators and presents opportunities arising from the pandemic and recommendations. The study adopted a qualitative approach through unstructured interviews, document review, and observation. The interviews were carried out in a focus group. Purposive sampling was used, where four records management personnel were interviewed. The data were analysed narratively by reformulating stories presented by the participants. The article reveals that the challenges included a lack of disaster preparedness plan, misfiling and loss of records, a lack of records management awareness among staff, an over-reliance on electronic records, and the production of audiovisuals despite a lack of policies and measures to manage these records. It was therefore recommended that the Botswana Communications Regulatory Authority develop and implement Covid-19 guidelines and remote working guidelines, the business continuity plan for records management and an audiovisual preservation strategy. It also recommended that records management personnel raise awareness of records management among staff.

**Keywords:** records, records management, Covid-19, Botswana Communications Regulatory Authority, Botswana



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## Introduction

In 2013, the Botswana Telecommunications Authority assumed the name Botswana Communications Regulatory Authority (BOCRA) through the enactment of the Communications Regulatory Authority Act (CRA Act) (Botswana 2012). The BOCRA is mandated by the CRA Act to regulate communication services in Botswana (Botswana 2012, A.141). The communications sector comprises telecommunications, the internet, information and communication technologies (ICTs), radio communications, broadcasting services, postal services, and related matters. The BOCRA is also the secretariat to two entities, namely, the Universal Access and Service Fund (UASF) and the Communications Regulatory Association of Southern Africa (CRASA).

Since the outbreak of Covid-19, most organisations have changed drastically, including the BOCRA. Unlike other sectors, the sector regulated by the BOCRA saw an increase in the demand for ICT services during the pandemic and as a result was categorised under essential services. The sudden demand for the services offered by the sector meant that the BOCRA as a regulator needed to redouble its efforts while working under strict Covid-19 protocols such as lockdowns, quarantines, and work-from-home programmes. Consequently, the Covid-19 events brought records management at the BOCRA into increased focus (Griffin, Hotard, and Fuller 2020). At the BOCRA that meant that changes to the records management processes had to be made while ensuring that it was business as usual and that employees were provided with access to the records and/or information whenever needed.

## Statement of the Problem

Records serve as an organisational memory and play an important role in ensuring that organisations fulfil their mandate by providing evidence of business transactions (Keakopa 2013, 37). Despite this, many companies do not give adequate attention to their records management plans because they believe a disaster is unlikely (Long 2020). Most people believe that the likelihood of a disaster occurring is low, because they have not recently experienced a disaster. Given the importance of records, one would assume that most companies would incorporate records management into their business continuity plans to plan for, protect against, and reduce the risk of disruptions caused by disasters.

In a study of more than a 100 records management professionals across the Australian public sector, Sheedy and Blackburn (2020) alluded that Australian government agencies have been violating records-management policies, which could have a negative impact during the Covid-19 pandemic. Furthermore, the study revealed that reliance on paper records is a major issue as it raises challenges for those working from home. Only 50 per cent of agencies indicated that they were at completion with the digitisation of hard copy records. Consequently, staff working remotely were forced to make decisions without consulting important information because the necessary records were not yet

digitised or could not be accessed from home. It suggests that owing to failure to plan for disasters such as Covid-19, challenges were bound to occur in such organisations. This article therefore examines records management practices at the BOCRA during Covid-19. Furthermore, the article will discuss the challenges and threats of managing records during the pandemic as experienced by records curators. Finally, the article will present opportunities arising from the pandemic and make recommendations.

## Overview of Records Management Practices at the BOCRA

At the time of this study, the BOCRA housed and managed its records and also those for the UASF and CRASA. The records management environment in which the BOCRA operated was a hybrid system in which records were created both in paper and electronic formats. Paper or physical records were managed through the Records Management Unit (RMU). Electronic records were managed by individual users or resided within the respective applications and systems. Furthermore, the BOCRA produced email records which were later printed and filed in physical files. However, BOCRA's paper files constituted a major percentage of the records.

Records management is a vital process for ensuring that documentary evidence produced and used by an organisation is created, managed, stored and disposed of in such a way that it remains authentic, safe, reliable and usable (Prati 2021). Good records management has always been important, but today's rapidly changing digital world and the uncertainties brought on by the Covid-19 pandemic provide even more reasons to manage records well. However, Keakopa (2013, 39), in a consultancy study at the Botswana Unified Revenue Services (BURS), highlighted that the main challenge at the BURS was the lack of effective systems and procedures that allowed the creation, maintenance and retrieval of records and information in both paper and electronic formats. The BOCRA was in a similar state which was reflected by the outdated records management policy, non-compliance with some regulations by the Botswana National Archives and Records Services, the lack of a records appraisal programme, the lack of a records retention and disposal schedule, the lack of a proper functional classification system, and the lack of a disaster preparedness plan.

Although the BOCRA had a business continuity strategy in place, the strategy did not deal with issues related to records management. The issues outlined hindered service delivery at the BOCRA. These shortcomings were not limited to time wasted in locating files, delays in responding to correspondence, misplacing or misfiling, duplicating documents, the lack of office space, heavy reliance on officers to track missing or misplaced files, and compliance risk reduction. This indicated that even before the Covid-19 pandemic, the BOCRA records management programme was not efficient.

Before the pandemic, the BOCRA planned to digitise its paper records. This would reduce limitations experienced when managing paper records. As more paper records were created, more filing storage was required, exacerbating the existing challenges of poorly managed papers, an effective flow of information, and poor retrieval of

information. Other issues included duplication of records, challenging access and the use of records, and lack of adequate storage for paper records. The management of both physical and electronic records became even more evident and problematic during the Covid-19 pandemic as the creation, maintenance, use and access of records were heavily affected.

## Research Methodology

The study sought to adopt a qualitative approach through unstructured interviews, document review and observation. The primary information used in this article was drawn from the author's recollection of events and experiences having worked with the records management team on the consultancy needs assessment of the Electronic Document and Records Management System (EDRMS) at the BOCRA. In addition, BOCRA records curators were interviewed. The secondary information used in this article was drawn from online sources, articles, journals, and the reports generated by the BOCRA including the records management policies and strategies.

The population of the BOCRA was 99 of which 4 employees worked at the RMU and 1 at the Chief Executive's (CE) office. The sample size for this study was 5 participants. However, at the time of this study, 1 employee went for further studies and was not interviewed. This study adopted purposive sampling as the participants were chosen based on their knowledge and experience of records management (Etikan, Musa, and Alkassim 2016, 2). The data were analysed narratively by reformulating stories presented by the participants considering the context of each case and the different experiences of each participant. The approach was adopted because the sample size was small.

## Findings of the Study

This section discusses the findings on BOCRA's records management practices during Covid-19, the challenges and threats of managing records during the pandemic as experienced by records curators, and the opportunities provided by the pandemic. The participants included records management personnel, their supervisors, and the executive secretary to the CE. To maintain anonymity, the participants were coded as participants A, B, C and D.

### **Managing BOCRA Records in the Covid-19 Pandemic**

When the first Covid-19 case was discovered in November 2019, the BOCRA was preparing to undertake a benchmarking exercise on implementing the EDRMS. However, Covid-19 was declared a global pandemic before the benchmarking exercise started, thus halting the process. Botswana like most countries went into a national lockdown and the BOCRA saw the need to proceed with implementing the EDRMS but opted to carry out a needs assessment of the EDRMS. The needs assessment was carried out to audit BOCRA records management practices and the review of the applications architecture to close the gaps identified and pave the way for implementing the EDRMS.

As lockdown measures entered into force, BOCRA employees were instructed to stay home and continued to work remotely to avoid physical contact with one another. Each department had to develop a work-from-home schedule to ensure that some employees worked at home while others worked at the office on a rotating basis. Most office meetings were moved online to video conferencing applications such as Microsoft Teams, Skype for Business, Cisco Webex, and Zoom. This meant that the BOCRA had to produce more electronic records than ever before via email, systems, and collaboration tools. Employees began to record Microsoft Teams meetings, therefore creating more audiovisuals that now reside in the cloud.

At this time, the BOCRA had migrated to cloud-based applications such as Microsoft Office 365, which enabled employees to continue using company emails without the need to access the company exchange server at the company premises. It ensured that staff did not use personal emails to communicate business matters. In addition, the BOCRA deployed virtual private networks (VPNs) on staff laptops to ensure that they could access company information from network folders, servers and systems. As a result, employees had access to electronic information. However, since most of the BOCRA records are managed manually as paper records, that increased reliance on electronic records.

A study carried out by Iron Mountain (2020) on the impact of Covid-19 on records and information management revealed that the majority of the organisations surveyed published remote work guidelines and policies, provided imaged copies of records and shipping paper records to the remote workers to support remote work. However, according to participant A, the BOCRA policy stipulated that no physical records were to be removed from the company premises without permission from the CE. Consequently, access to physical records became a major challenge as they could not be availed to officers working from home. However, making copies of records and shipping them to actioning officers could have been time-consuming, as the RMU was already operating with skeletal staff of one employee at the office per given day.

In addition, the policy stipulated that all incoming mail, either in paper or in electronic format, should be dealt with and delivered to the CE's office where it is actioned to the relevant directors. Participant B stated that when Covid-19 struck, for some time they did not understand how they could ensure that the process was completed without compromising the flow of information. However, together with RMU personnel, they scanned incoming physical records and forwarded them to the CE so that he could mark them for action by the directors working from home. It was noted that this was not an issue with email correspondence which were easily forwarded to the CE.

### **Challenges and Threats of Managing Records during the Pandemic**

The BOCRA, like many other organisations, was unprepared for the onslaught of remote work driven by Covid-19. As a result, the BOCRA's operations had to be rethought to ensure business continuity. Record-keeping was no exception, and both

challenges and threats emerged. Despite the challenges posed by the Covid-19 pandemic, record-keeping remained critical at the BOCRA. Employees had to follow established policies and procedures for record-keeping, including retention schedules. According to Ashley (2020), routine access to public records filing and retrieval has been cut off or severely limited because of the pandemic and the traditional flow of information has been disrupted, resulting in serious gaps and inconsistencies in reporting. This was confirmed by all the participants during the interview. They stated that since the start of Covid-19, BOCRA employees have requested folio numbers to use; however, the corresponding letters have never been forwarded to the RMU for filing. They also mentioned that as records deteriorated, it became more difficult to correct such correspondence. According to participant C, another gap was created when circulating email was not submitted to the RMU for filing. As a result, records went missing and may never be recovered.

Most entities were still in panic mode during the first national lockdown, and, owing to the work-from-home initiative, only one RMU employee remained at the office to assist officers requesting access to records. This caused delays in access to records. Participant D stated that most employees would request references, and if they were not availed on time, the employees would pick random files they could use, resulting in loss and misfiling of records. Participant B also stated that because actioning officers worked in different locations, emails sent to them were not responded to promptly, and that records management personnel had to follow up constantly to ensure that they had been actioned to. The challenge with this approach was that the evidence of action was never submitted to the records curators, and they had no idea where the information was saved. Similarly, participant D was concerned that BOCRA records were being compromised and that they could be lost or unlawfully destroyed, particularly electronic records, because copies were never submitted to the RMU for filing. Furthermore, he emphasised that it is possible that BOCRA officers stored these records in numerous digital sources, resulting in losing traceability of those electronic records, making retrieval difficult.

The pandemic has resulted in an increase in misfiling, particularly of paper records. Employees requesting folio numbers would call the RMU officer, who would provide them with the most recent folio numbers used. When an employee failed to provide the RMU with the most recent correspondence, it did not appear on the file, so two or more correspondences shared the same folio number. As an example, Figure 1 depicts the filing issues with File BOCRA611 X.

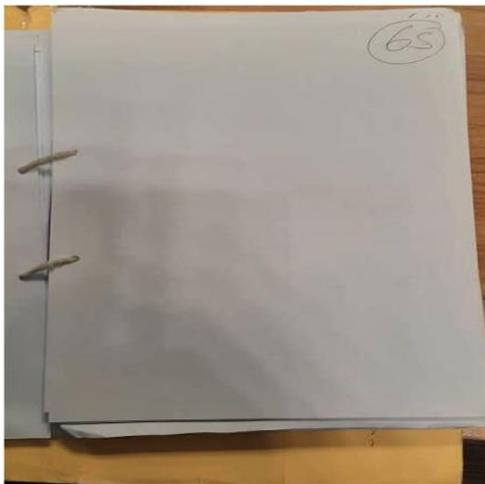
Pictures 3 and 4 in Figure 1 are letters with the same folio number (66) but that are letters to different entities. Picture 2 shows that folio number (65) was skipped and Picture 1 depicts a strategy employed by the RMU to redress the filing issues raised by participant D.



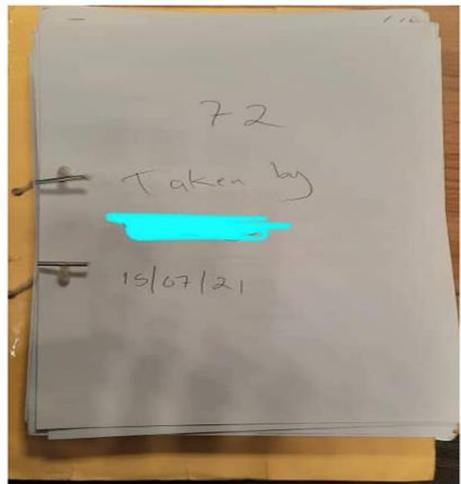
Picture 4: Folio 66



Picture 3: Folio 66



Picture 2: Skipped Folio



Picture 1: Missing Correspondence

**Figure 1: Filing issues**

To ensure that the number of such cases was reduced, participant D stated that the RMU resorted to making notes in files indicating that folio numbers had been requested and the name of the requestor. That was successful in the sense that the officers could be asked to forward the correspondences for filing. However, the approach has a limitation in that if the correspondence has been deferred, a folio number will be unused if the subsequent folio has already been taken. According to participant B, the filing issues were spawning other issues such as cross-referencing, which was exacerbated by the missing correspondences and information that resided in different computers. Furthermore, she stated that she had spent a significant amount of time attempting to

locate records never filed, substantiating participant D's claim that records were being misplaced, dispersed and disintegrated.

According to the author's recollection, there was a problem with signing electronic documents without having to print them, especially when officers were working remotely. Some letters or memorandums at the BOCRA required the signature of various employees, and it was difficult to have them sign a single document when they were in different locations. Some employees had proxies act on their behalf, whereas others preferred per procuracionem signatures. The approach violated the BOCRA policy that all outgoing correspondence be signed by the respective directors, but the problem was solved by using Signiflow, a digital signature tool.

During the pandemic, the most commonly used video conferencing tool at the BOCRA was Microsoft Teams, which also had meeting recording capabilities. The application allowed employees to record meetings, but the BOCRA lacked both the measures to preserve such records and the policies to govern them. As a result, these records remained in the Microsoft 365 cloud, where they would be deleted after a certain time. Participant B cautioned that because employees' audiovisual productions were used as official records and were frequently requested by external stakeholders following meetings with the BOCRA, it would be unfortunate if the BOCRA did not preserve them because they could have legal implications. Employees may be forced to abandon traditional minute taking in favour of online recordings because of this development.

Participant A believed that the issues raised above were caused by a lack of awareness by BOCRA staff about records management issues. He clarified that the employees may not have understood the importance of records and the consequences of their decisions, such as not filing and improper handling of records. Similarly, participant A complained about the confidentiality of records, particularly when officers were constantly working remotely. Participant C confirmed this, stating that he frequently received correspondence from officers via WhatsApp, either in text or in pictures, raising concerns about the security of these platforms.

In 2020, the National Archives and Records Service of South Africa published the recommendations on handling paper records during the Covid-19 pandemic (National Archives and Records Service of South Africa 2020). These recommendations implied that if paper records were not handled properly, they could increase the risk of the virus spreading, so they advised record curators on the way in which to handle them. Furthermore, they cautioned that even if records were contaminated, no one had the authority to destroy them without a disposal authority issued by the national archivist. Surfaces were constantly cleaned at the BOCRA and staff were encouraged to sanitise their hands regularly. The biggest setback for paper records was that disinfectants are harmful to paper and should not be used on paper records.

## Opportunities Presented by the Pandemic

This section discusses the opportunities (Figure 2) that arose because of the pandemic, as observed by the author of this article and the records curators at the BOCRA.

**Figure 2:** Opportunities presented by Covid-19 at the BOCRA



According to the participants in this study, the opportunities presented by Covid-19 at the BOCRA included cost reductions on stationery, increased use of information technology (IT) tools, cleanliness at the RMU, and the fast-tracking of implementing the EDRMS by management.

### Cost Reduction of Stationery

Participant D stated in the interview that as a unit responsible for stationery management, they have noticed a decrease in the number of reams of A4 paper purchased for the organisation per year since the pandemic began. He estimated that the number of boxes of paper purchased by the RMU for the BOCRA was around a 100 per quarter, but during the first year of the pandemic, a 100 boxes lasted the entire financial year. Since there has been a reduction in printing, the number of printing cartridges purchased annually has also been reduced significantly. This could be attributed to a lack of records printing, and it could be confirmed that their reliance on electronically stored information has increased since the start of the pandemic. Table 1 presents the funds utilised at the BOCRA for Quarter 1 ending on 30 June 2019, Quarter 1 ending on 30 June 2020 and Quarter 1 ending on 30 June 2021. It can therefore be deduced that

in a normal year (June 2019 to June 2020), the funds used to purchase stationery were almost P8 000.00, whereas during the pandemic, the cost was nearly P4 000 (June 2021), which is 50 per cent less. This could validate that the cost of stationery at the BOCRA has decreased since Covid-19.

**Table 1:** Use of stationery funds at the BOCRA

Quarter 1 ending	Funds used (BWP)
30 June 2019	7 440.00
30 June 2020	253 192.90 – 245 252.90 = P7 940.00
30 June 2021	3 797.45

### Implementing the EDRMS

Before Covid-19, the BOCRA was in the process of implementing an EDRMS. Covid-19 ensured that management saw the need and urgency to implement the EDRMS. At the time of this article, the needs assessment for the EDRMS and a Statement of User Requirement (SOUR) document were completed. Accordingly, the implementation process of EDRMS had started.

### Using IT Tools

The participants asserted that the challenge of signing correspondences presented an opportunity for the use of software for digital signature workflow that the BOCRA integrated into the Sage X3 ERP for the Finance Department. Signiflow is software for digital signature workflow that digitises any process that requires a document to be legally signed or approved using advanced electronic signatures (Mucheki Consulting 2018, 3). There was a lack of staff buy-in when Signiflow was deployed in the organisation and the software was underutilised until Covid-19 struck. Owing to the adversity, the BOCRA adopted the use of Signiflow to legally sign documents that needed to be signed by various employees at different locations. Participant A commended the use of Signiflow for the actioning of files as it was fast, efficient and effective, and most importantly because it had provision for reminding the actioning officers by sending reminders via email.

It was observed that the Microsoft Office 365 suite was also underutilised before the pandemic. However, as more employees needed to work remotely, they began to use Teams, SharePoint and OneDrive to collaborate and share information with their respective colleagues and external stakeholders. Consequently, as highlighted by participant A, the employees had to learn new skills and retool themselves to ensure that they worked with those applications. He also opined that it improved organisational performance and productivity.

## Cleanliness

Participants A and D alluded that cleaning at the RMU had always been a struggle, but owing to the constant cleaning of the offices and surroundings in accordance with the Covid-19 protocols, the RMU has been cleaned regularly. Consequently, the constant cleaning of the RMU reduced the chance of the destruction of records by pollution, mould and dust. In addition, the cleaning of surfaces was beneficial as it reduced the chances of RMU officers spreading and/or contracting the virus.

## Conclusion

The BOCRA was not prepared for the Covid-19 pandemic and the records management programme was not effective and efficient. Challenges were therefore bound to happen. These challenges included the lack of a disaster preparedness plan, misfiling and loss of records, the lack of records management awareness by staff, the over-reliance on electronic records, and the production of audiovisuals despite the lack of policies and measures to manage these records. However, on the bright side, there was a 50 per cent estimated cost reduction in purchasing of stationery, an increased use of IT tools, an acceleration of implementing the EDRMS, and improved cleanliness at the RMU.

## Recommendations

This study revealed that the records management programme of the BOCRA faced Covid-19 challenges and threats. The study yielded the following recommendations:

- The BOCRA should develop and implement Covid-19 and remote work guidelines. The guidelines should guide records management during the pandemic to ensure that they remain authentic, safe, reliable and usable. Employees should be guided on maintaining privacy and confidentiality while working remotely.
- The records management personnel at the BOCRA should raise records management awareness to sensitise the employees on the importance of records.
- The records management personnel at the BOCRA should develop and implement an audiovisual preservation strategy to ensure that the records produced via Teams are stored and preserved accordingly.
- The BOCRA should develop and implement a business continuity plan for records management to cater for disruptions and disasters.

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