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Modernising records management in selected commercial banks in Uganda: challenges and strategies

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Abstract

Modernising records management is a key factor in ensuring smooth operations and efficiency for commercial banks. This paper is based on a study that explored the adoption and use of modern records management approaches in selected commercial banks in Uganda. The study adopted the explanatory approach to assess the current state of records management systems in Ugandan commercial banks, identify strategies to implement modern records management systems in the banks, identify the challenges faced by the banks in modernising records management, and propose solutions for enhancing the modernisation of records management for the banks. A descriptive research design was used. The study population comprised records managers, their immediate supervisors, operations managers responsible for overseeing bank operations, and human resources officers involved in their recruitment. These were selected using the non-random (purposive) sampling method. This method was used because the researchers were looking for groups which were responsible for records management in the area of study. Data was collected from primary sources and data collection involved the use of in-depth interviews, observation and document analysis. The findings revealed that commercial banks in Uganda rely heavily on paper-based systems, even though digital options like documents management systems, mobile banking applications and digital archiving systems exist. It was noted that the technology in the commercial banks was guiding the modernising of records management through streamlining workflows, automating records capture and converting paper-based records into electronic formats. The banks lacked comprehensive records management policies. This resulted in a shortage of records staff, insufficient funding for electronic records management systems, and the absence of official electronic records management systems. Potential solutions include hiring professional records managers, investing in technology to manage both paper and electronic records using official records management systems, upgrading paper record

storage facilities, developing retention and disposal schedules, and providing records management best practices training to all bank employees.

Keywords: commercial banks, records, bank records, records management, Uganda

Introduction

Modernising records management (RM) in commercial banks is increasingly becoming the trend. Specifically, modernising RM, in this study, refers to the intentional adoption and use of Electronic Document and Records Management Systems (EDRMS) to perform recordkeeping functions in the commercial banks' operations. The author prefers the term EDRMS as many of the systems on the market handle either electronic documents or electronic records. In this study an EDRMS is defined as: '... an automated system which supports the creation, use and maintenance of paper or electronic documents and records for the purposes of an organisation's workflow and processes. An EDRMS includes recordkeeping functionality and also manages documents of informational rather than evidential value. The EDRMS includes the whole of documents, records, methods, procedures, tools, [meta]data (index terms), knowledge, means and persons with which an organisation operates and fulfils its requirements to preserve evidence of its activities, maintain its memory, and preserve its knowledge (Gary & Bowen, 2005). For banks looking to use technology to increase operational effectiveness and efficiency while adhering to regulatory obligations, this technological transition is essential. By adopting EDRMS, banks can streamline business processes, manage diverse document formats, and ensure the long-term preservation of critical corporate records. EDRM Systems are pivotal in the modernisation of records (Evans & Lewis, 2021). This initiative is aimed at ensuring the electronic control of the creation, storage, and sharing of records. Modernising the management of records in banking impacts all facets of the institution, including organisational structure, customer interactions, internal culture, and the range of products and services offered (Klein & Olson, 2018). Effective records management plays a crucial role in this context, as it empowers banks to enhance customer interactions, make informed decisions, and safeguard customer rights.

The Ugandan legal landscape for commercial banks is shaped by the Uganda Financial Institutions Act (2016), often abbreviated as UFIA. This Act serves as the cornerstone legislation, defining what constitutes a commercial bank in Uganda. UFIA outlines the activities that are permissible for commercial banks, such as accepting deposits, granting loans and earning interest. In essence, it acts as the rulebook for commercial bank operations within the country. While the Act does not explicitly define bank records, Ugandan legal principles align with the broader understanding established by researchers such as Scannella and Blandi (2015), Jorion (2009), Gupta and Kolari (2005) and Garderen (2003), which refer to a bank record as any information created by banks during their regular operations. Commercial bank records include both physical and digital documents. This encompasses a wide range of information, from customer data like account statements and loan agreements to employee files.

The records act as the lifeblood of the bank, storing crucial information for smooth operations and informed decision-making (Evans & Lewis, 2021). The records serve as vital evidence in various situations, such as performance analysis, legal disputes, audits and fraud detection. According to Bessis (2010), efficient operations rely on well-organised recordkeeping systems that allow banks to locate the necessary information promptly, supporting smooth and efficient operations. Cihak (2015) adds that commercial banks rely on accessible and accurate records to meet customer demands effectively. Failing to manage records properly can lead to lost evidence and potential legal or regulatory issues.

History of commercial banks in Uganda

Uganda's commercial banking sector emerged in the 1960s (Kimaite, 2016). The commercial banks are subject to oversight by regulatory bodies such as the Bank of Uganda (BoU), which oversees currency management and foreign exchange reserves as per the Bank of Uganda Act of 1966, amended in 2013. Acting as the central bank of Uganda, the BoU is tasked with regulating and supervising the commercial banking sector to ensure adherence to best banking practices and a strong commitment to professional standards in the industry (BoU, 2019).

From 1987 onwards, a series of ambitious reforms were introduced with the aim of enhancing efficiency within the sector. However, an economic downturn resulted in a notable decline in the number of bank branches and services. By the early 1990s, several indigenous commercial banks were failing to adopt and use modern records management, necessitating intervention by the central bank to enforce ICT application in the banking sector (Muthinja & Chipeta, 2018).

The BoU took decisive action, including strengthening recordkeeping regulations and supervision, establishing the Financial Stability Department (2007) to monitor systemic risks, and lifting the moratorium on new banks (July 2009) to allow better planned expansion (Zeman, Kalmar & Lentner, 2018). The Electronic Records Transaction Act (2010) was also introduced. These measures, coupled with economic recovery optimism, led to a gradual increase in the number of commercial banks, with new players entering the market and existing banks expanding their reach (Osiro, 2019; Nannozi, 2011).

By 2021, Uganda's commercial banking sector boasted an impressive expansion involving 42 commercial banks, 546 bank branches, 818 ATMs, 13 million bank accounts, and 11,000 banking agents. In 2024, Uganda's commercial banking landscape was dominated by major players, including Stanbic Bank, dfcu Bank, Centenary Rural Development Bank (CRDB), AbsaUG Bank, Bank of Baroda, Citibank Uganda and Equity Bank (Baguma, Irumba & Mugambe, 2024). This oligopoly of major commercial banks plays a critical role in driving Uganda's economic development, as envisioned in the National Development Plan III (NDP III) (Uganda National Planning Authority, 2020). This is a national development strategy for transforming Ugandan society into a modern and prosperous country that is well integrated with technology. Notably, the plan emphasises the importance of modernising records management within the banking sector to achieve its goals, such as increasing average household incomes and improving overall quality of life. Therefore, modernising records

management within these major banks is crucial for the efforts of the banking sector to achieve both the NDP III objectives and overall financial stability in Uganda.

Problem statement

Modernising records management involves the adoption and use of specialised, automated systems which supports the creation, use and maintenance of paper or electronic documents and records for the purposes of an organisation's workflow and processes (Johnston & Bowen, 2005; Evans & Lewis, 2021). These systems provide various benefits, including enhanced customer service, regulatory compliance, financial gains, successful teamwork, simplified audit trails, and improved productivity. However, the BoU's annual supervision reports for 2020 and 2022 identified persistent issues with commercial banks' software systems for managing records. Besides, a 2019 report by the Uganda Bankers Association revealed that poor recordkeeping in Ugandan banks had led to scandals, posing a significant threat to the entire banking sector. This suggests that Ugandan commercial banks are plagued by disorganised records management systems, leading to difficulties in retrieving information. The lack of organised records management systems significantly hinders timely access to crucial data, jeopardising the commercial banks' ability to manage risks like fraud, loan default, and money laundering (BoU Report, 2022). Therefore, investigating how Ugandan commercial banks can modernise their RM practices is vital for improving service delivery and transparency, and for contributing to the country's economic development.

Purpose and objectives of the study

Through analysing these challenges and exploring potential solutions, the study aimed to develop practical strategies that would enhance records management practices within these banks. The specific objectives of the study were to:

- Explore the ways commercial banks manage their records.
- Analyse the composition, skills, and training of the human resources dedicated to records management within the selected commercial banks in Uganda
- Identify factors affecting the adoption and use of modern records management systems in Ugandan commercial banks.
- Identify strategies for implementing modern records management systems in commercial banks in Uganda.

Conceptual framework of the study

The international standard for records management (ISO 15489) is the theoretical framework of choice for this study. The ISO 15489-1:2016 standard, establishes a set of principles and concepts that serve as a foundation for building and implementing a robust RM system. While it offers guidance and best practices, it doesn't dictate a specific theoretical approach. Organisations can adapt the framework to suit their unique needs and circumstances. The standard, helped to clarify the component parts of RM in this study. Not only does ISO 15489 outline the key principles and best practices for recordkeeping, but it also provides useful information on the functional requirements for modernising records management. The standard is a framework for organisations to follow in modernising their records management

programmes (Reed & Gurner, 2017). The core of this standard lies in understanding the nature of records themselves, the data that describes them (metadata) and the systems used to manage them. ISO 15489 also emphasises the importance of establishing clear policies for effective recordkeeping. In the context of Ugandan commercial banks, the concepts outlined in ISO 15489 (2016) were used to understand the specific requirements for modernising their records management practices. When viewed through the lens of this international standard, successful implementation and adoption of technology, the hiring of competently trained records management staff becomes crucial for achieving progress towards improved service delivery in the commercial banks. Therefore, this standard, helped the study to focus on key elements required for modernising RM practices in the selected commercial banks in Uganda. While not solely focused on commercial banks, the standard emphasises practical application and aims to help organisations achieve specific objectives related to RM, such as compliance, efficiency, and risk mitigation that inherently lead to a more contemporary approach to managing records. It also advocates for the hiring of qualified records managers with the expertise to implement modern recordkeeping systems; develop and use specialised records management systems (RMS); and integrate RM into existing business systems, streamlining workflows and making recordkeeping part of everyday business processes. Through recommending these practices, ISO 15489 indirectly encourages organisations, including commercial banks, to modernise their records management.

International organisations such as the World Bank (2005) and the International Monetary Fund (2023) reinforce the need to apply the ISO 15489 concept by advocating a multi-faceted approach to modernising bank records management. This includes embracing technology, automating processes, establishing information governance practices, and fostering a culture of change within banks. Studies by Muthinja and Chipeta (2018) suggest that by addressing these areas, banks can reap significant benefits. These include improved efficiency and productivity, enhanced information security, reduced storage costs, increased accessibility and searchability of records and, ultimately, better decision-making capabilities. Investing in modern records management empowers banks with a multitude of advantages, safeguarding their future and laying the groundwork for success. This emphasises the critical importance of modernising all record formats within commercial banks.

Literature review

The literature review was guided by specific themes derived from the research objectives, as outlined below:

Importance of records in commercial banks

Commercial banks rely heavily on accurate, well-maintained and easily accessible records for their daily operations. Records in commercial banks are considered valuable assets, just like cash and property, and require protection from damage, loss and unauthorised access. Scholars (Derua, 2020; Laurens, 2012; Amusa & Salman, 2011) uphold the view that records promote operational efficiency. Records document all business transactions, allowing for personalised services and efficient responses to customer inquiries, ultimately boosting overall efficiency.

Records, in either digital or paper format, serve as crucial evidence to identify fraudulent activities and misconduct, reducing false reporting (Laurens, 2012). Mulcahy (2015) concurs with Laurens (2012) when she observes that a commercial bank will not stay in business without creating, keeping, using and maintaining its records.

Kimaite (2016) reports that accurate and complete records are essential for compliance with existing regulations. Banks can use records to verify the accuracy of decisions, disclosures and filings against customer information and regulatory requirements. Shahin and El-Achkar (2017) emphasise that records enable banks to make informed decisions based on concrete data and metrics, thereby mitigating financial risks. Their study proffers the view that commercial bank records provide evidence of processes and procedures, and hence help banks identify and mitigate potential financial risks in real time. Maintaining accurate records is also crucial in safeguarding business and ensuring financial transparency and accountability within the commercial banks (Derua, 2020).

Shahin and El-Achkar (2017) and Derua (2020) note that records act as proof of actions taken, commitments made and obligations fulfilled. Without proper records, commercial banks cannot function effectively and might even face legal challenges (Ambira & Kemoni, 2011). Therefore, modernising records management practices will ensure that records are accurate, organised and accessible, which is fundamental to the success of any commercial bank. Records play a vital role in the day-to-day operations of commercial banks, and this improves customer experience, saves costs and enhances risk management (Gup & Kolari, 2005). For commercial banks, records are vital since they act as a protective shield, safeguarding their operations, processes, and the very foundation of their business.

Records management practices in commercial banks

Effective records management practices involve ensuring that records are accurately identified and managed in accordance with clear rules and guidelines. Banks must identify and document the specific requirements for records creation, which include determining what information needs to be captured, how it should be formatted, and the context necessary for the records to be understood and used effectively. The actual creation of records involves capturing information in a structured format that adheres to the defined recordkeeping requirements. This can include creating documents, filling out forms, recording transactions, or capturing electronic communications. The creation process must ensure that records are properly dated, signed and provided with a unique identifier. Afterwards, banks need to design and implement recordkeeping systems.

According to ISO 15489-1:2016, recordkeeping systems must be designed and implemented to support the creation and maintenance of records. These systems must ensure that records are accurate, complete and reliable. The design should also facilitate easy access and retrieval, ensure security and privacy, and allow for efficient maintenance and disposition of records.

Proper classification and indexing of records follow the capture of records. According to the International Standards Organisation (ISO 2016), classification involves organising records into structured categories based on shared characteristics or related subjects. Scannella and Blandi (2015) suggest that after records are created, they should be categorised based on their value. Effective classification allows employees to quickly find the information they need without unnecessary delays. Indexing is another practice which involves creating a list of keywords associated with records or their groups. This speeds up the process of locating and retrieving specific records or data within a records storage area. This is particularly beneficial in customer service settings, where quick access to client records or transaction histories can significantly enhance the customer experience, especially where high-volume transactions are concerned.

Once records have been properly categorised, classified and indexed, secure storage and ongoing maintenance become paramount to ensure the records are preserved, protected from damage, and made readily accessible when needed (Ambira & Kemoni, 2011). Keeping electronic-based records involves using appropriate storage solutions such as Amazon S3, Google Cloud Storage, and Microsoft Azure. Physical records can be stored in equipment like filing cabinets and shelves in dry rooms with controlled temperature and humidity (Cihak, 2015).

Modernising records management practices in commercial banks also necessitates the application of robust security measures, such as encryption, access controls and regular security audits, as emphasised by Rexwhite et al. (2013). This is crucial in protecting sensitive financial records from unauthorised access, loss or misuse. In essence, a well-designed records management system with in-built security measures is needed for commercial banks to prevent sensitive data from being accidentally or intentionally compromised or lost (Bake, 2015). It provides the necessary protection to detect and respond to unauthorised access attempts within the bank.

As commercial banks modernise their records management practices, adopting retention and disposal schedules becomes essential, as advocated by Garderen (2003) and the World Bank (2000). Retention schedules in banks are necessary to dictate timelines for how long each type of record must be kept. The schedules serve two critical purposes. First, they define the different types of records needed to be retained, ensuring that banks only hold onto information for as long as legally and operationally required (Kimaite, 2016). Second, the schedules establish systematic and controlled procedures for disposing of records that have reached the end of their retention period. These schedules must be regularly reviewed and updated. This eliminates the need to store outdated records, minimising the costs associated with records storage and maintenance.

By following the practices, commercial banks can establish and maintain modern records management systems that support productivity, collaboration and compliance with legal and regulatory requirements.

Technology adoption for records management in commercial banks

The banking industry is undergoing a major shift towards modern records management, as highlighted by Evans and Lewis (2021). This shift offers several benefits, including making records more secure, accurate and accessible, and minimising the risk of lost or misplaced records (Molla, Alsharekh, & Ngu, 2019).

Technology adoption increases operational efficiency in commercial banks by improving data backup and recovery. As Barclay and Perring (2020) observe, the use of technologies such as Robotic Process Automation (RPA) has automated repetitive tasks like filing and data entry, saving time and minimising errors. Artificial Intelligence (AI) is also making inroads. AI-powered software such as FinanSeer and Kensho can analyse complex data to predict fraud detection and identify potential risks, as highlighted by Nyangosi et al. (2014).

Sanderson and Ward (2016) observe that digital solutions have replaced paper ones. This enhances retrieval, searching, and working remotely on bank systems and data from virtually anywhere, at any time (Lobres et al., 2020; Rexwhite et al., 2013). Technology also reduces labour-intensive paper processes and manual activities, enabling users to provide real-time feedback, which speeds up the change approval process and boosts overall efficiency (Lusimba & Kwanya, 2019).

In this digital age, streamlining the entire recordkeeping process requires the use of modern tools for Electronic Records Management Systems (ERMS) (Reed & Gurner, 2017). Substituting paper-based systems with EDRMS prioritises digital transformation (Adam, 2008). In today's hybrid contexts, Gurunlu (2019) emphasises the necessity for Enterprise Documents & Records Management Systems (EDRMS) that can manage paper, electronic documents, and records, hence providing a comprehensive solution for managing all forms of records. Another expanding trend is the digitalisation of paper records, which has major advantages for making banking products accessible to a bigger number of customers (Chibuike, 2015; Molla et al., 2019).

Role of records management staff in commercial banks

The effective management of records in commercial banks relies heavily on the expertise and dedication of the records management staff. As noted by Nyangosi et al. (2014), records management personnel are responsible for developing and operating systems and procedures for managing all types of bank records, regardless of format (physical or electronic). Lobres et al. (2020), Mulcahy (2015) and Bulitia (2006) emphasise the need to prioritise and adequately support records staff. This ensures they have the equipment and training necessary to secure all bank records effectively.

Researchers like Kimaite (2016), Bake (2015) and Ambira and Kemoni (2011) underscore the critical link between professionally trained records management staff and the overall success of a commercial bank. Poor practices in managing records directly affect the quality of services

the bank can deliver (Bake, 2015). Bank performance will suffer if the records management personnel are incompetent.

The banking industry increasingly demands a workforce proficient in leveraging technology for improved records management practices. Bake (2015) stresses that records management staff need to be competently trained to handle the challenges of modern records management and protect the banks' valuable assets. They should be able to choose the appropriate software for managing records at various stages, such as a Document Management System (DMS) to manage electronic documents as they become electronic records and provide a secure and centralised repository for the entire bank, and an Electronic Records Management System (ERMS) to capture and organise workflows, facilitating efficient search and retrieval capabilities. Therefore, modern management of records involves hiring and retaining qualified records management professionals. Their commitment serves as the driving force behind successful records management modernisation, ultimately benefiting the entire organisation.

Challenges of modernising records management in commercial banks

The process of modernising records management systems in commercial banks, particularly in Africa, is hindered by several substantial challenges. These can be broadly categorised into issues with financial constraints, limited access to technology and lack of trained personnel.

Limited financial resources hinder commercial banks' ability to invest in modern records management systems in developing countries. Banks struggle to afford modern records management software, leading to reliance on inefficient manual processes (Ambira & Kemoni, 2011). For digital records, commercial banks fail to adopt and utilise up-to-date technology. For manual records, banks lack sufficient funds, limiting the acquisition of adequate storage space for the physical records. These factors collectively increase the risk of data breaches and loss, which affects service delivery.

Many developing countries lack the necessary technological infrastructure, including reliable internet connectivity, power supply, and computer hardware (Singh, Klobas, & Anderson, 2007). Furthermore, unreliable power supply and inadequate ICT infrastructure in rural areas impede access to digital devices, which limits the adoption of electronic recordkeeping solutions. This is particularly true where consistent electricity supply may not be guaranteed (Lobres et al., 2020). Besides, electronic systems are susceptible to failure due to hardware and software obsolescence, software updates and storage media degradation.

The lack of personnel skilled in records management is another critical challenge. The scarcity of staff trained to handle mainly the digital systems and navigate complex programming creates significant hurdles (Evans & Lewis, 2021). Without a workforce equipped with the necessary records management knowledge and expertise, promoting a culture of adopting and using modern recordkeeping systems becomes difficult. This is further exacerbated by the limited availability of training opportunities, specifically in developing countries (Bake, 2015).

Modernising records management in commercial banks, therefore, requires addressing a complex interplay of financial, technological and human resource challenges. Addressing these challenges is crucial for creating solutions that enhance modernising records management practices to promote operational efficiency.

Methodology

This study was descriptive in nature, involving the use of mixed methods for data collection. The study population was surveyed using a standard questionnaire as well as interviews by means of an interview guide. The study population comprised managers and officers from the selected commercial banks. Eight banks were selected for the study including banks with significant market share to ensure the findings are relevant to a substantial portion of the banking industry. The eight banks were purposively selected including a mix of privately owned, government-owned, and foreign-owned banks (Uganda Bankers Association Financial Stability Report, 2019), to understand the impact of different ownership structures on records management practices. The study targeted 8 records managers, 8 operations managers and 8 human resource officers because they are responsible for the day-to-day operations of their units, which inevitably involve the creation, use, and management of various records. They can provide valuable insights into the practical challenges and resource requirements for managing records within their specific operational contexts, therefore, could provide key insights to inform the study. Brannen (2016) notes that valuable information is gained from people selected basing on the administrative position they hold in their institutions. Data was collected through face-to-face interviews using unstructured interview schedules from each manager in each of the eight chosen banks. In addition, a structured observation checklist was used to observe the following phenomena: the technology used by the bank for capturing records; the storage system in place; security procedures; and the ICT facilities available in the offices. Document review of each bank's procedural manuals was also applied to identify what guides staff in records management.

Data analysis involved drawing qualitative inferences from interviews and observation of the commercial banks' records management practices. During and after the study, all the respondents remained anonymous. The researcher used a coding scheme to maintain confidentiality and to preserve the anonymity of the research participants (Saunders, Kitzinger & Kitzinger, 2015). This involved the use of the numbers 1–8 to represent the interviewees.

Findings

Findings are presented below, organised according to the research objectives outlined in Section 4.

Description of respondents

The study involved 24 respondents (100% of Records Managers, 65% of Human Resource Managers, and 50% of Operations Managers) who participated in managing records within

their respective commercial banks. The participants held a diverse range of qualifications, with nine (38%) holding postgraduate degrees and 15 (62%) possessing bachelor's degrees. In terms of industry experience, six (25%) had worked for less than two years, while 18 (75%) had a tenure of over five years. This combination of qualifications and experience made them well-suited to contribute to the study.

Objective one: state of records management in Ugandan commercial banks

The study aimed to investigate the extent to which modern RM is practiced by Ugandan commercial banks in their delivery of banking service. The findings showed that records existed in both paper and electronic formats.

It was reported that the records were created in paper format and they ranged from customer files, account statements and transactions, receipts, contracts, securities (such as leases and title deeds) and payment vouchers, to minutes and reports, accounts payable and receivable, among others, while computer-based records were managed by individual departments. Observation revealed that most of the records in these banks were in paper format, confirming that many records were not digitally born or created.

It was also reported that usage of electronic systems was going on with the application of business systems like the Loan Administration Systems, messaging systems like email, MS Word documents, spreadsheets, PowerPoint slides and digital photographs. ICT applications enabled commercial banks to capture, store and distribute a number of records over electronic networks. The operations manager from Bank 3 stated that:
the use of manual records was losing momentum because of the increased use of business information systems such as the human resources system and client management databases. (OPM 3)

A records manager from Bank 1 stated that:

> there is increased use of digital communication systems, video conferencing, teleconferencing and Zoom in addition to office applications which had word-processed documents and spreadsheets. (RES 1)

According to the operations manager in Bank 1,
We are transitioning to a more digital system, but currently maintain both electronic and paper-based records. We use Finacle for automated banking operations and FileTrail for managing large datasets. We also use DataStore for storing scanned documents digitally. (OPM 1)

It was observed that the commercial banks were using different technologies such as web pages, emails, intranets and extranets to operate, communicate and collaborate. These are platforms on which records are created in electronic formats. All the operations managers were of the view that by utilising these technologies, the banks were shifting from paper-based communication to electronic methods. Records were increasingly distributed via email, intranet, and internet, eliminating the need for printed copies. The research results corroborate the findings of Ambira and Kemoni (2011), who observed that commercial banks were

employing automation technologies such as OCR and AI to categorise documents based on their content, metadata, and context, saving time and reducing human error.

According to the operations managers from the eight banks, the banks had adopted Salesforce Service Cloud, Microsoft 365 and SharePoint from among Microsoft 365 cloud tools to facilitate searching for required information and the storage of the increasing volume of records. With these platforms, the banks are able to upload records to electronic platforms and make them accessible to team members for shared use. The uploaded files could be accessed and used by the authorised officers from any location. The operations manager from Bank 6 stated:

Microsoft 365 is one of the broad cloud computing services used in records management. We utilise various capacities of Microsoft 365 like Microsoft OneDrive, which allows sharing and tracking transactions electronically, and Microsoft SharePoint, which is used for document management and improved collaboration and information sharing among team members. Additionally, Microsoft Purview is used to provide data discovery, access controls and security. (OPM 6)

The above finding confirms that commercial banks are adopting the use of technology in records management, where centralised storage is enforced and the sharing of information is going on between different systems and datasets. Digitising of records involving the conversion of paper-based records into electronic formats was also ongoing at a limited pace. Three banks had developed an indexing system that included every type of record they handled.

A records manager from Bank 2 observed:

Indexing helps tracking and making data searching more efficient, which enabled the commercial banks to process and extract information timely. (Rise 2)

The operations manager from Bank 7 confirmed the above when she stated:

We initiated a transformation of the front-end banking experience by launching internet and mobile banking services. These platforms provided a smooth user interface, making banking products accessible to a wider audience. (OPM 7).

The above findings regarding the state of records management indicates that the selected Ugandan commercial banks recognise the need to enhance customer experience and accessibility by embracing digital banking solutions

Objective two: records management staffing in the commercial banks

The study sought to find out the structure, size and skills of records management staffing, that is, the number of records management staff who carried out records management practices in the commercial banks. Document analysis of the banks' 2019 payroll registers revealed that records management staff included a records manager as the most senior official, followed by records officers, records clerks and records assistants, as illustrated in Table 1.

Table 1: Records management staffing in commercial banks

Officers	Establishment	Filled	Variance
Records Manager	8	5	-3
Records Officers	16	10	-6
Records Clerks	24	13	-9
Records Assistants	24	24	0
Total staff	**72**	**52**	**-20**

Table 1 indicates that there were 72 records staff positions in the eight banks but only 52 were filled. It was interesting to note that all the selected banks had filled the lower-cadre staff records assistant positions to 100%. Regarding the variation in the number of records management staff in the previous year, the study found that there had been a decrease, especially that when a member of staff resigned or died, they were not replaced. This finding confirmed that there was a records management staffing gap in the commercial banks (Bulitia, 2006).

Objective three: barriers to modernising records management in commercial banks

The study sought to find out the challenges faced by the commercial banks in modernising records management. Generally, the respondents observed that the management of records had become increasingly complicated owing to the wide array of formats they worked with: paper, electronic files, email, instant messages, social media, and big data, among others.
For the paper-based records, the major challenge was the lack of consistency in record creation procedures, storage locations, and methods.
The records staff from Bank 5 reported:
Our current system of filing cabinets and shelves is overflowing and inefficient. Because the records storage areas are full, it's time-consuming to find the information we need, causing delays and hindering our work. (RES 5)

Our bank currently relies on manual processes for managing records, including storage, search, retrieval and tracking. This approach has proven to be very slow and inefficient. Additionally, retaining all physical records generated year after year isn't feasible due to the associated costs and operational burdens. (RES 2)

Another records staff member complained about workflows and approval processes. He reported:
The primary concern lies not merely in the failure to forward records to the records office, but in the potential loss of invaluable documents. Officials often resort to destroying important documents to free up space in their offices, resulting in irretrievable losses. (RES 7)

Other records staff said that when files were kept in individual officers' offices, confidentiality was not easy to enforce:

The lack of a centralised record storage system poses significant risks. Client records, being highly confidential and sensitive, demand strict access controls. Centralised storage in designated areas is crucial to enforce these controls. Moreover, the current system leads to prolonged search times for retrieving files, hindering efficiency and productivity. (RES 6)

Lack of training and guidance to staff on proper filing practices and procedures is rampant. Document filing guidelines, protocols and best practices to ensure consistency and adherence to established standards are not available. (RES3)

Observation indicated an over-retention of records, including both active and inactive ones. None of the eight banks surveyed had established procedural manuals or records retention policies to guide their records archiving practices. Interviews with bank staff revealed that this stemmed from management's indecision about disposal practices – specifically a lack of a policy-driven retention and disposal schedule across the commercial banks studied. The records users kept everything without having in place clear retention and disposal guidelines. Amusa and Salman (2011) emphasise the importance of a records retention plan for good business practices and the protection of vital information

Observation in the surveyed banks revealed several aspects of the records management system:

- Observing staff retrieve and file paper records highlighted the challenges posed by the large volume of physical records, suggesting potential fatigue and inefficiencies in the process.
- The substantial volume of records made it extremely difficult to locate required files.
- Lack of disposal practices led to excessive storage of records, thus congesting records storage areas.

Further probing revealed that while the implementation of ICT services such as internet banking, cloud storage, and digital archiving had enhanced efficiency, it had also introduced new challenges in managing electronic records. The respondents observed:

Electronic records are susceptible to various risks that can lead to data loss or compromise. For example, physical storage devices like hard drives and tapes degrade over time, potentially causing data loss. (RES 1)

Banks sometimes feel pressure to delete electronic records from storage devices to free up space for newer data. (OPM 5)

Electronic records sometimes lack essential context information, making them difficult to interpret in the future without additional information. (HRM 3)

Changes in technology renders electronic records inaccessible when the necessary software or hardware becomes obsolete. (HRM 6)

Over time, the accuracy of electronic records deteriorates due to various factors such as software errors, hardware malfunctions, or human intervention. (HRM 1)

The operations manager from Bank 7 commented:

Our bank maintains both paper and electronic records. However, managing the electronic records over time presents a challenge. This is partly due to the lack of dedicated electronic records management software, which would help us effectively track, organise and preserve these important records. (OPM 7).

The human resource manager from Bank 2 explained:
The increasing popularity of online banking through internet and mobile platforms, while offering numerous advantages, presents a significant challenge: managing the vast number of electronic records generated by these services. (HRM 2).

A member of the records staff from Bank 2 lamented:
Our bank often utilise multiple information systems, each generating and exchanging records with the others. This movement of records between different systems, known as data migration, can be complex and challenging to manage. (RES 2).

A records staff member from Bank 3 stated:
While advancements in technology have significantly improved information gathering and distribution through faster computers and photocopiers, effectively managing and accounting for the ever-growing volume of digital records remains a significant challenge. (RES 3)

The researchers observed that managing records digitally poses a significant risk of losing critical evidence and loss of customer confidence. Without a well-defined strategy, the adoption and effective use of modern records management systems becomes exceedingly challenging.

A human resource officer from Bank 1 observed:
Our bank, like many organisations, has not made full use of the information and communication technology (ICT) for effective records management (RM). Although we utilise electronic systems, these systems lack the specific functionalities required for robust RM. Furthermore, the chosen RM tool or application does not adequately support essential RM functions, hindering optimal record management practices.
The operations manager from Bank 2 stated:
Electronic records management is a challenge within our bank. Our limited involvement in designing the systems we use has led to a lack of centralised control over who creates and stores what electronic records. This significantly hinders our ability to properly account for and manage these important assets. (OPM 2).

A human resource officer from Bank 4 noted:
Inaccurate records lead to difficulties in recovering loans, managing accounts, and detecting fraudulent activities, leading to financial losses. (HRM 4)

All the eight operations officers from the surveyed banks agreed that poorly managed records were hampering the banks' ability to track transactions, analyse trends and make informed decisions.

The study observed the use of business systems in two banks, including scanning systems to convert paper documents into digital formats. However, these electronic systems lacked

dedicated recordkeeping functionalities. Consequently, the stored electronic records held more informational value than evidential value, meaning they were not considered official records for legal or compliance purposes. Additionally, some of the scanned documents were not even classified as records in the first place.

Observation revealed that electronic information transactions often bypassed established recordkeeping procedures, and all banks surveyed struggled with accessing vital electronic records. All the respondents indicated that they were receptive to solutions. Interviews showed a willingness on their part to adopt ICT systems and digitise paper records for better management. Interviews also revealed that the respondents were open to adopting ICT systems and embraced the idea of digitalisation of the paper records. Staff expressed a desire for improved skills through training to support the digitisation process. An operations manager reported:

To enhance efficiency, we must provide our staff with continuous training on managing electronic records. These records are generated through various applications and often move through channels without proper recordkeeping capabilities. This makes it difficult for records staff to quickly locate and track these vital documents. (OPM2)

In response to the question about the staff's lack of skills in managing electronic records, another operations manager provided their perspective:

Although we provide initial training for new staff during their first month, it seems insufficient to equip them for the challenges they face with managing digital records. This training gap results in difficulties for our staff in handling this increasingly crucial aspect of their work. (OPM6)

All the respondents expressed significant concerns about the inadequacy of the current systems, particularly regarding their unsuitability for managing digital records. They highlighted the potential risks of poor recordkeeping practices affecting efficient and accountable business operations. Additionally, a consistent theme emerged regarding the declining quality of records staff and the widespread lack of capacity and expertise in handling electronic records. Kuldeep and Manpreet (2017) report that providing records management training and awareness to bank staff helps in fostering a culture of accountability for and responsibility towards managing bank records effectively. They point to the necessity of training that covers the importance of effective records management practices, data security protocols and regulatory compliance requirements.

Discussions

The implementation of EDRMS in commercial banks presents significant practical implications (Derua, 2020). According to Evans and Lewis (2021), while the benefits and potential return on investment are evident, the reality often involves a hybrid approach, with paper-based records coexisting alongside electronic ones. This hybrid necessitates a comprehensive system such as EDRMS, which can effectively manage both formats, unlike more limited Electronic Document Management Systems (EDMS) or Electronic Records Management Systems (ERMS). Commercial banks that fail to adopt a comprehensive EDRMS and instead rely on disparate tools for their recordkeeping functions risk significant operational

inefficiencies and may ultimately fail to deliver effective services (Kuldeep and Manpreet, 2017). This is exemplified by the use of separate indexing systems for different record types, highlighting a lack of integrated and standardised approach (Bake, 2015). Some organisations also mistakenly equate indexing systems or cloud storage with a true EDRMS, demonstrating a lack of clear understanding and consistent application of the concept (Muthinja & Chipeta, 2018). Compounding these challenges is a significant staffing gap within the banking sector. Not only are there shortages in qualified records management professionals, but also a lack of adequate computer skills among existing staff (Zeman, Kalmar & Lentner, 2018). This hinders the effective utilisation of EDRMS, as evidenced by the observation that "the management of records becomes increasingly complicated when a wide array of formats are worked with" (Chibuike, 2015). These factors collectively impede the successful implementation and utilisation of EDRMS within the banking sector. Also, the lack of consistency in record creation procedures, storage locations, and methods for both paper and electronic-based systems indicate a lack of adherence to international standards such as ISO 15489, potentially increasing risks and hindering operational efficiency.

Conclusions and recommendations

In summary, addressing these records management challenges is crucial for the financial sector's integrity and overall economic growth in Uganda. The study revealed that the selected Commercial Banks traditionally relied heavily on paper-based record-keeping systems. This reliance on manual practices such as filing and shelving resulted in inefficiencies, including limited storage capacity and difficulties in retrieving records. Although there were databases and other electronic records, the study found that there aren't many advanced systems for handling them. This technological lag hinders the adoption of modern recordkeeping practices and presents a barrier to efficient service delivery.

The findings highlight the need for commercial banks to:

- Embrace electronic records management systems by replacing manual practices with robust electronic systems, which will improve accessibility, efficiency and storage capacity.
- Invest in technological advancements through modernising infrastructure and adopt reliable systems for managing electronic records, which is crucial for efficient operations and compliance.
- Modernise recordkeeping practices by adapting recordkeeping methods to integrate seamlessly with banking processes to enhance service delivery and overall success.
- Impose stricter regulations and conduct more frequent audits of commercial banks' recordkeeping practices.
- Provide training and guidance to staff on proper records management practices and procedures.
- Document filing guidelines, protocols and best practices to ensure consistency and adherence to established standards.

Modernising records management in commercial banks involves a holistic approach that encompasses people, processes and technology to optimise the management of records throughout their life cycle. To address the identified challenges, the following recommendations are proposed as strategies for commercial banks:

- To ensure business continuity and minimise legal liabilities, commercial banks should implement and enforce a comprehensive records management policy. This policy should prioritise budgetary allocations to overcome financial constraints.
- On the technical side, banks should modernise their records management infrastructure by replacing outdated systems and integrating Electronic Document and Records Management Systems (EDRMS).
- With the shortage of professional records management personnel, the commercial banks should build internal expertise in records management through recruiting trained personnel with expertise in records management to improve overall recordkeeping practices. On-the-job training should be provided to the existing staff to keep them abreast with sound recordkeeping practices and emerging technological advancements. Some staff can also be sent to seminars and workshops to broaden their knowledge of records management best practices.
- On the systems side, the banks should implement systematic records management practices by developing retention and disposal schedules. The banks should create bank-wide schedules for the retention and disposal of various records, addressing storage cost concerns.
- Technology transformation should involve integrating and securing Electronic Records Management (ERM) systems by consolidating existing systems. Banks should combine separate ERM systems into a single, integrated platform for improved records storage, search and retrieval times.
- Regarding security control of the records, robust security measures should be implemented to safeguard the integrity and confidentiality of electronic records.
- There is need to adopt an industry standard in records management such as ISO 15489 for records management etc. to establish metadata standards.

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