

The Principles at Work in a Canadian Regional Government

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Recordkeeping may look the same in government as it does in business, but there are important differences in both how and why records are kept. (See Figure 1 on page 39.) To their credit, the Generally Accepted Recordkeeping Principles® (Principles) can provide as much practical value in the public sector as they do in business.

Just ask Clare Cameron, CIP, information management coordinator for the Regional Municipality of Niagara, which serves 12 communities in Ontario, Canada. The Niagara region nestles between Lake Erie and Lake Ontario, with the Niagara River as its eastern boundary with the United States. It covers 1,852 kilometers and has a population of more than 427,000. One of its best-known features is Niagara Falls.

Regional municipalities in Canada are something like U.S. counties. They are formed in populated areas to realize cost efficiencies in providing centralized services to an entire area rather than having each town provide its own.

Impetus for Records Management

At its inception in 1969, the Niagara regional government was primarily a vehicle for capital improvements, such as roads and water treatment projects that required significant funding. The early impetus for records management came from the Financial Services Department as it focused on the need to keep track of capital, debt, and tax collection records associated with these public works projects.

The Region's services now include water, waste collection, public transit, police, emergency services, public health, and social services, and it creates an estimated 1.2 million paper and electronic records annually.

Steps Toward IM Services

Niagara Region's first steps toward a formal information management services (IMS) function began in 1991, driven in part by the passage of the Ontario Municipal Freedom of Information and Protection of Privacy Act. This legislation gives citizens access to municipal information and mandates the privacy of personal information that governments maintain about individuals.

In terms of the Principles, the law requires government organiza-

Entity	Business	Government
Reason for existence	<ul style="list-style-type: none"> • Make a profit for shareholders 	<ul style="list-style-type: none"> • Serve the public
Reason for records	<ul style="list-style-type: none"> • Develop new products • Market products successfully • Account for revenues and costs 	<ul style="list-style-type: none"> • Document democratic processes, citizen rights, and obligations • Operate services for the public good
Major concern about records	<ul style="list-style-type: none"> • Protect intellectual property 	<ul style="list-style-type: none"> • Assure openness and accessibility as part of public accountability
Emphasis on	<ul style="list-style-type: none"> • Predicting the future 	<ul style="list-style-type: none"> • Preserving history

Figure 1: Comparison of Public- and Private-Sector Need for Records

tions to demonstrate the Principles of Protection and Availability as integral aspects of compliance.

Records Retention, Storage

As part of its efforts to meet the law's requirements, Niagara initiated its first records retention bylaw and retention schedule based on the Ontario Municipal Records Management Standard (TOMRMS), a methodology for organizing municipal documents that was itself developed by the Association of Municipal Clerks, Managers and Treasurers of Ontario, a professional organization for government leaders.

TOMRMS includes a classification scheme, records descriptions, generic codes to track and inventory records, and retention periods. By 2000, Niagara Region had a records retention schedule, an in-house records storage facility, and an Access database to track record locations.

"There was and continues to be an increased focus on accountability, risk management, privacy, and access," says Cameron, who has held her current position since 2008. "We must as-

sure that the public can access required records but also assure that there are no privacy breaches."

Principles in Play

Cameron first became aware of the Principles by attending ARMA International events. When reviewing them in more detail, she noticed parallels with the Canadian Standards Association's Privacy Code, which Niagara had used for its corporate access policy.

"The Principles sum up values and best practices that we were already aiming to achieve," says Cameron, "But they provide a structure, a framework for ensuring that ideals can be met."

Applying the Principles

Some of the opportunities and challenges in applying the Principles at Niagara Region are a direct result of the unique situations governments face.

Accountability

While the Principle of Accountability recommends that a senior ex-

ecutive be involved in the records program with responsibility distributed throughout the organization, this is not always possible in regional government.

In U.S. counties, for example, leadership is a combination of elected, appointed, and hired positions, and departments exist in peer relationship rather than in any strict hierarchy. Departments have their own budgets and the freedom to choose their own information management methods. In these situations, records and information management staff can provide advice and guidance in the hope of influencing department decision makers, but there is no top-down mandate.

The same is true for Niagara Region, where IMS reports to the Office of the Regional Clerk, which is part of the Integrated Community Planning Department reporting to the chief administrative officer.

Cameron has dealt with the accountability challenge in several ways. She has developed a network of super users and administrative staff within the divisions and departments. She also turns to Legal Services and Information Technology on questions of legality and security.

In the near future, "The Principles will be formally incorporated to drive discussion at a newly reworked Information Governance Committee composed of staff with a particular interest or concern in information management across the organization," notes Cameron. Niagara is also trying to recruit Information Governance Committee members who report directly to senior management.

Another challenge has been to translate the Principles so senior management can grasp the concepts and see their practical application at Niagara.

"Offering the entire Principles

framework would potentially be overwhelming,” says Cameron, “so we have to find ways to communicate the Principles to managers in a way that is specifically meaningful to their areas.” She has found that using scenarios works well in this regard, as they can paint a picture of what needs to happen if a given event occurs and the crucial role that good recordkeeping practices can play.

Cameron has discovered that there is also great diversity in the understanding of information management within departments. Departments that handle a high volume of private information, such as Public Health, tend to have a better understanding than those that don't, she says.

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Compliance

Under the Principle of Compliance, Cameron is working to improve legislative research, which she sees as an important part of the retention program. IMS has revised its records bylaw every 18 months to two years. According to Cameron, “The latest revision has been very significant. We are reducing the number of overall codes to choose from when classifying records for retention purposes and improving the level of detail in descriptions.”

Because physical records storage was outsourced in 2012, Cameron is revisiting legal requirements as a potential way to make retention pe-

riods shorter, where possible – a move that may result in cost savings for contracted records storage services. Work on the new bylaw also includes identifying the Office of Record for each records series as a way to reduce the amount of duplicate information being retained and stored.

Another change is an attempt to separate record series from filing needs. Cameron explains, “We are trying to make a distinction between the goals of the retention bylaws and the day-to-day filing needs of the business units.”

Previously, there were attempts to use the retention bylaws as departmental filing standards. Now the hope is to reduce the complexity

of the records bylaw and make it easier to use, working in partnership with departmental filing needs instead of competing with them.

Transparency

The Principles were incorporated into a new 2012 Records and Information Corporate Policy and will be listed as a reference to the upcoming 2013 Records Retention By-law. By documenting policies and making processes easy to understand, Cameron hopes to support the Principle of Transparency as well as the Principle of Compliance.

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policies, to be perceived as fresh, current, and easy to understand in order to improve compliance across the organization,” she states.

Integrity

The Principle of Integrity presents a challenge for paper records stored offsite. While boxes are coded and an audit trail of box movement is possible, the same isn't true for folders. There is no way to know whether anything has been removed from a paper file that has been retrieved. Cameron's efforts to ensure integrity of paper files are chiefly through training and informational sessions.

She is currently working on an online model for teaching privacy and information protection. IMS also does custom training that is flexible and designed to connect with the Region's staff in meaningful ways.

Cameron is also striving to raise awareness that records policy and bylaws apply to both paper and electronic records, and she is currently working with Niagara's Information Technology (IT) Solutions staff on this. For electronic records, the potential overlap of tasks between IMS and IT is perhaps the greatest challenge.

“IT may have initiatives under way that have governance implications for IMS, but because we operate in different departments, we may not always be aware of these efforts,” Cameron says.

Protection

She has used the Principle of Protection to try to work more closely with IT and security staff to ensure that questions of security and protection are being addressed when new systems are created. The Principles have been useful in these conversations and provide a reference for the right questions to ask. “It is part of our IMS goal to present ourselves as open, easy to contact,

and eager to collaborate,” notes Cameron.

Disposition

The Principle of Disposition is an example of the need for such close cooperation. Cameron is in the process of developing procedures for disposing of expired electronic records on shared drives, “but for structured data the issue is more delicate, as many database entries are cross-referenced, so deleting expired entries may compromise the quality of associated data. Disposition tools are seldom built into electronic systems from the beginning and are difficult to add later.”

Increased collaboration and enhanced partnership with IT are at the top of her list for the future.

Next Steps

This year, Niagara Region’s IMS plans to use the Information Governance Maturity Model (IGMM) and perform an assessment of the information management program, its effectiveness, strengths, and weaknesses. The results will be used as input to the IMS strategic plan and as a way to prioritize a work plan for the six-member IMS team.

“We’re aiming for a [maturity level] three in most categories of the IGMM, realizing that it will take time to close any gaps identified through the model, but our group culture is to take a proactive stance on issues,” says Cameron, “and we know that processes in information management are always evolving. Our immediate plan is to increase the emphasis on compliance, performance monitoring, and measurement for the relative success and status of the corporate-wide information management program.”

It’s safe to say that the Principles will be ready to help. **END**

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