

DELIVERABLE

City of Guelph

**Records and Information Management
(RIM) Strategy**

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1. Executive Summary

The City's need for a records and information management (RIM) strategy was first articulated in 2012 in the *Corporate Technology Strategic Plan*¹:

“The development of a Records and Information Management (RIM) program for the City is a key recommendation of the IT Corporate Strategic Plan. In June 2012, Council approved funding to support the first phase of this program which will focus on the development of an inventory of City records and current record and information management practices. The findings of this assessment review will be used to inform the future development of a broad-based RIM strategy for the City. A RIM strategy will articulate the needs of the organization with respect to information management and will provide a roadmap for the future.”

The City engaged Ergo Information Management Consulting (Ergo) to develop a five year RIM strategy to outline key phases and deliverables necessary for developing a holistic and integrated lifecycle approach to information management, including physical paper and electronic records from active to inactive and permanent retention, and establish a detailed roadmap for a corporate RIM program.

To support development of the RIM Strategy, Ergo completed a current environment assessment which included:

- Assessing the City's current RIM landscape by reviewing relevant City documentation/ data, surveying employees about their RIM practices and needs (22% survey response rate), and consulting with selected stakeholders about the RIM strategy and RIM program development.
- Using an online survey to document and assess the RIM trends and approaches of selected comparator municipalities (100% response rate)².
- Benchmarking the City's current RIM environment and practices against the *Generally Accepted Recordkeeping Principles*®.
- Assessing the similarities and differences between the principles in the *Information Governance Maturity Model* and the document and content management requirements in *The DAMA Guide to the Data Management Body of Knowledge (DAMA-DMBOK Guide)*.

This document (the RIM strategy) provides recommendations to address the gaps/risks which were identified and enable the City to take a comprehensive, holistic, defensible, and best practices-based approach to the lifecycle management of all of its information assets.

¹ City Clerk's Office, *Open Government Framework* (Committee Report # CHR-2012-55), *Attachment 1: A Survey of Open Government* [November 13, 2012].

² The City selected the following municipalities as comparators and invited their Records Managers (or equivalents) to complete the survey: Barrie, Burlington, Cambridge, Greater Sudbury, Kingston, London, Toronto, and Vaughn.

Findings

Our data collection and analysis revealed the following observations (summarized):

1. **RIM Governance**: RIM governance encompasses a governance model (i.e. a management structure for ongoing RIM guidance and support), a policy framework for the adoption of good RIM practices, RIM staffing, and processes to monitor and report on RIM policy implementation. RIM governance observations are presented below.

The City Clerk (or designate) is responsible for the RIM program; however, responsibility for managing the City's archival records has not been formally assigned. Unlike many other Ontario municipalities, the City does not have any committees to support RIM and service areas/departments do not participate in RIM governance. Future meetings of the Information Management Steering Committee were deferred following the inaugural meeting in 2012.

On the policy front, the City has drafted – but not approved or implemented – two RIM policies (a *Records Management Policy* in 2012 and a *Corporate Recordkeeping Policy* in 2014) and selected recordkeeping-related policies (e.g. a *Privacy Policy* and an *Electronic Data Retention Policy*). Some technology use policies, both draft and approved (e.g. the draft *Bring Your Own Device (BYOD) – Policy and Rules of Behaviour*) do not (fully) address RIM implications such as information classification, retention, and security. In the absence of a comprehensive suite of policies³ addressing all recordkeeping activities, employees lack the necessary direction for efficiently and effectively managing recorded information.

Two Specialist positions (one for Records and Information and the other for Access and Privacy) in the City Clerk's Office were recently replaced by the new Program Manager, Information, Privacy and Elections position. While this change provides permanent, full-time program management for both the RIM and access to information/privacy functions, the Program Manager will be unable to execute all of the position responsibilities during the 8-12 months immediately prior to each municipal election event without additional resources. Further, the current staff complement is insufficient to support the RIM and access to information/privacy functions during the multi-year implementation of the RIM strategy.

The current environment assessment also revealed that the City does not currently audit compliance with its Records Retention By-law or policies that involve or affect recordkeeping such as the *Clean Desk Policy* or *Video Surveillance Policy*.

2. **RIM Processes**: The current environment assessment revealed a number of gaps or deficiencies in the City's current RIM processes as summarized in Figure 1 below.

³ The *Records Retention By-law* provides direction for records retention and disposition.

Figure 1 – RIM Process Deficiencies

RIM Process	RIM Sub-Process (if applicable)	Deficiencies
Information Creation, Capture, and Declaration	Information Creation	<ul style="list-style-type: none"> • The City may not be creating all necessary records for each business process • The records the City is creating may not include all necessary information • The City may be creating records unnecessarily
	Information Capture and Declaration	<ul style="list-style-type: none"> • Records duplication causes inefficiency and confusion • Challenges of managing hybrid records
Information Classification, Search, and Retrieval	Searching for Information	<ul style="list-style-type: none"> • Employees experience greatest difficulty when attempting to retrieve information in e-mail, Ernie/Infonet, or a department (T:) drive • Failure to quickly find information (particularly the correct/final/authoritative record) can result in embarrassment, loss of confidence in municipal government/its employees, and reputational risk • The City may be unable to say definitively that it has found all relevant data/documents/records/information in response to <i>MFIPPA</i>, discovery, and other requests • City employees spend a significant amount of time (500 to 1,500 hours <u>per week</u> at minimum) searching for information
	Quality of Information Retrieved	<ul style="list-style-type: none"> • Many employees are not confident that the information (documents or data) that they use in their work is correct, current, and up-to-date
	Central Electronic Repository	<ul style="list-style-type: none"> • The City does not have a central electronic repository in which to store documents/records of interest, use, and/or benefit to all employees
	Records Classification Scheme	<ul style="list-style-type: none"> • Diverse, <i>ad hoc</i>, and informal records classification structures • Many of the records classification structures do not meet employees' needs • Duplicated efforts to create, use, and maintain multiple structures across the City • Most service areas/departments organize paper and electronic records differently
	Electronic File Naming Conventions	<ul style="list-style-type: none"> • <i>Ad hoc</i>, unpredictable electronic file names compromise search and retrieval • Lack of version control standardization may cause confusion and retrieval delays • Potential negative outcomes if an incorrect version is used in decision-making, released publicly, submitted as evidence in court, or released under <i>MFIPPA</i>
Information Sharing and Collaboration	Electronic Collaboration	<ul style="list-style-type: none"> • Limited use of the M: drive may indicate that cross-departmental collaboration is performed elsewhere (e.g. by circulating draft documents for feedback via e-mail) • Interest in improving the ability to collaborate on documents with other employees

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RIM Process	RIM Sub-Process (if applicable)	Deficiencies
Information Storage	Paper Records Storage	<ul style="list-style-type: none"> Lack of standardization and internal security in managing inactive paper records Paper records storage constraints in service areas/departments or elsewhere
	Electronic Records Storage	<ul style="list-style-type: none"> Network data volume continues to grow The EDMS (without needed RIM policies, procedures and training) may not be a viable alternative to file server storage Inefficient and time-consuming process to print and file paper copies of electronic records
	Electronic Records Storage with Third Parties	<ul style="list-style-type: none"> Service level agreements with third parties (e.g. Salesforce.com, Facebook, YouTube, etc.) may not provide adequate management of the City's electronic records
Information Privacy, Security, and Protection from Disaster	Information Security	<ul style="list-style-type: none"> The City does not have an information security classification
	Secure Information Destruction	<ul style="list-style-type: none"> Shredding disposal consoles are not available at all City locations and the availability of alternative shredding capabilities at those locations is not known Responsibility is split for co-ordinating and funding the shredding of paper records
	Vital Records	<ul style="list-style-type: none"> Vital records are not identified or protected Original by-laws are exposed to the risk of damage/loss when loaned to staff
	Network Back-up and Recovery	<ul style="list-style-type: none"> Indefinite retention of daily and weekly back-ups will result in some records/information being kept longer than allowed by the <i>Records Retention By-law</i>
	Disaster Plan	<ul style="list-style-type: none"> Disaster plan includes placeholders only for City Clerk's Office, Corporate Communications, and Information Technology Services Data/documents/records used to perform essential services are not identified
Information Retention and Disposition	Records Retention Schedule (By-law)	<ul style="list-style-type: none"> A six year interval between <i>Records Retention By-law</i> amendments Less use of the by-law to manage electronic records retention, particularly in corporate applications
	Records Holds	<ul style="list-style-type: none"> Confusing records hold terminology Informal 'destruction hold' process is contrary to RIM best practices
	Records Disposition Authorizations	<ul style="list-style-type: none"> Employees may be destroying paper records without the City Clerk's approval Electronic records disposition practices do not comply with the <i>Retention By-law</i>
Managing Archival Records	Archival Review	<ul style="list-style-type: none"> (Potential) archival records are not physically identified or segregated Records backlog pending archival review may result in storage space constraints
	Archival Records Storage and Access	<ul style="list-style-type: none"> Archival records at City facilities are at risk of loss or damage Providing access, particularly public access, to the City's archival records is challenging in the absence of an index or a central storage location Significant risk that archival records in electronic format will become inaccessible over time in the absence of a digital preservation strategy Uncertainty regarding the terms of the agreement with Guelph Public Library for the City's archival

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RIM Process	RIM Sub-Process (if applicable)	Deficiencies
		records
	Digitizing Archives	<ul style="list-style-type: none"> Archival data/records not being digitized to support the City's open government initiative
	Digital Preservation	<ul style="list-style-type: none"> Electronic archival records and electronic records requiring long-term retention for business, financial, or legal reasons are at risk of loss
RIM Communications and Training		<ul style="list-style-type: none"> Use of RIM resources on the City Clerk's Office Intranet is not tracked Links to RIM-related policies elsewhere on the Intranet are not provided No RIM or access to information/privacy training plan No regularly scheduled RIM or access to information/privacy training RIM and access to information/privacy training is not mandatory
Technology	Newer/Emerging Technologies	<ul style="list-style-type: none"> Website content not managed as City records Social media content not managed as City records Use of third party communications applications (e.g. GMail) for City business contravenes City policy RIM principles are not considered when purchasing software
	The EDMS	<ul style="list-style-type: none"> Unsuccessful EDMS implementation EDMS use occurs without the necessary RIM framework
	Data Management	<ul style="list-style-type: none"> No formal governance linkage between RIM and data management
	Open Government	<ul style="list-style-type: none"> No formal governance linkage between RIM and open government

These challenges are not uncommon among public, private, and not-for-profit sector organizations with which we have worked. Our experience has demonstrated that significant improvements can be made with appropriate organizational support, the development and implementation of tools for RIM best practices, an emphasis on training, and the strategic use of supportive technology.

The City's current RIM environment was measured against the *Information Governance Maturity Model*, an internationally recognized RIM benchmarking tool. The ratings we assigned to the City are set out in Figure 2 below along with a proposed target level for each principle to help the City identify its RIM priorities. (The rationale for each rating is provided in Appendix 3 of this report). The proposed Level 3 targets are the minimum level according to ARMA International, the world-wide professional association which developed the *Generally Accepted Recordkeeping Principles®* measured by the *Information Governance Maturity Model*.

Figure 2 – Information Governance Maturity Model Ratings

Principle	Definition	City's Current Level	City's Target Level
Accountability	A senior executive (or person of comparable authority) shall oversee the information governance program and delegate responsibility for RIM to appropriate individuals. The organization adopts policies and procedures to guide personnel and ensure that the program can be audited.	2	3
Transparency	An organization's business processes and activities, including its information governance program, shall be documented in an open and verifiable manner, and the documentation shall be available to all personnel and appropriate interested parties.	2	3
Integrity	An information governance program shall be constructed so the information generated by or managed for the organization has a reasonable and suitable guarantee of authenticity and reliability.	1	3
Protection	An information governance program shall be constructed to ensure a reasonable level of protection to records and information that are private, confidential, privileged, secret, classified, essential to business continuity, or that otherwise require protection.	1.5	3
Compliance	An information governance program shall be constructed to comply with applicable laws and other binding authorities, as well as with the organization's policies.	2	3
Availability	An organization shall maintain records and information in a manner that ensure timely, efficient, and accurate retrieval of needed information.	2	3
Retention	An organization shall maintain its records and information for an appropriate time, taking into account its legal, regulatory, fiscal, operational, and historical requirements.	2	3
Disposition	An organization shall provide secure and appropriate disposition for records and information that are no longer required to be maintained by applicable laws and the organization's policies.	2	3

The above ratings are illustrative, but should not overly alarm the City. These scores should be considered opportunities for the City to target and prioritize key areas for improvement. Indeed, many organizations with which we have worked started with comparable scores and are either working toward or have succeeded in attaining the Level 3 targets.

We also observed some notable strengths and opportunities to support the development, operation, and sustainability of a RIM program at the City:

- Management interest in RIM, as demonstrated by the commissioning of this assessment.
- Higher awareness of RIM resulting from the *Records Inventory Assessment* and the recent *Employee RIM Survey*.
- Employee interest in RIM, as demonstrated by high levels of employee engagement during the data collection.
- The existence of some (draft) framework policies and tools which will provide a starting point for RIM program development and the establishment of standardized and defensible RIM practices.

RIM Strategy

We recommend the City adopt the following vision statement to guide RIM program development, implementation, and sustainability:

The City of Guelph's recorded information will be managed in accordance with law, policy, standards, and procedure to support program and service delivery, foster informed decision-making, facilitate accountability, transparency, and collaboration, and preserve and ensure access to recorded information for the benefit of present and future generations.

Records and information are critical and strategically important assets. Like financial and human resources, records and information must be effectively managed using defined principles reflected in documented practices, policies, standards, procedures, business rules, and facilitating tools and technologies. Specifically, records and information must be created, organized, secured, maintained, and used to support:

- Regular administrative and operational work.
- Predictive activities, such as planning and budgeting.
- Answering questions about past decisions and transactions.
- Demonstrating and documenting compliance with applicable laws, regulations and standards.

The City will conduct each stage in the RIM life cycle in a disciplined and methodical manner, thus permitting more effective and efficient operations, the optimization of the value of

investment in information assets, supporting better decision-making, and providing for improved sharing of information both internally and with key external stakeholders. The City's management of recorded information (data, information, and records) will be guided by the eight *Generally Accepted Recordkeeping Principles*® defined in Figure 2 above.

Given the City's increasingly electronic work environment, a cultural shift will be required to achieve this vision and meet the needs of employees and stakeholders. New and improved RIM practices will be implemented and sustained to reliably manage the lifecycle of all information resources so that:

- Information is created in a standardized way.
- Information is classified meaningfully.
- Information is easily retrievable and usable in the course of decision-making, service delivery, and all other municipal functions.
- Information is accessible for authorized uses.
- Information is shared and used more effectively.
- Information is protected from alteration, loss, or unauthorized disclosure.
- Information is kept only as long as defined in the *Records Retention By-law* or until the expiration of any (legal) hold.
- Information not subject to a (legal) hold is appropriately disposed of, leaving a record/audit trail of its disposition.
- RIM is perceived by employees and management to make a demonstrable contribution to the attainment of the City's strategic goals.

The RIM Strategy identifies four strategic priorities (overarching areas of activity) and specific goals for each priority as shown in Figure 3 below.

Objectives have been identified for each goal to describe the specific action(s) to be completed. More than one objective may be required to achieve a goal.

Figure 3 – Strategic Priorities and Goals

Strategic Priority	Goal #	Goal
RIM Governance	A1	To develop, implement, and sustain a RIM governance model
	A2	To develop, implement, and regularly review a comprehensive suite of RIM/recordkeeping and RIM-related policies
	A3	To establish and sustain a staffing model to provide RIM expertise
	A4	To develop and implement a RIM compliance monitoring program
RIM Processes	B1	To manage information creation, capture, and declaration
	B2	To manage information classification, search, retrieval and access
	B3	To manage information sharing and collaboration
	B4	To manage information storage
	B5	To manage information privacy, security, and protection from disaster
	B6	To manage information retention and disposition
	B7	To manage archival records
RIM Training and Communications	C	To develop and implement RIM communications and training
Technology	D	To implement and sustain technology that supports the RIM program and to proactively address the RIM implications of technology

Implementation/Action Plans

An implementation/action plan which balances operational capacity, risk, and cost was developed for each goal to guide the City in implementing the strategy. The sequence of activities within each implementation/action plan and across those plans as a group is both prioritized and phased. Most objectives can be completed over a five year period, with many being implemented in the first couple of years of the timeline, assuming the support of management, the creation and staffing of a RIM Specialist position, the availability of suitably qualified additional resources, the active participation of employees, and the timely granting of approvals.

While all goals in the RIM Strategy are important and their collective accomplishment will ensure successful strategy implementation, it is helpful to assign a priority to each objective for planning purposes. Each objective has been assigned a priority: high, quick win, medium, or low. To a significant extent, the prioritized order reflects the nature of the relationships between the goals and their respective objectives, and an ordered approach to RIM program development and implementation. For example, the goals under the ‘RIM Governance’ strategic priority properly form the required framework inside which RIM program development and implementation will occur. The objectives in the strategy are listed by priority category in Figures 4 – 7 below.

Figure 4 – High Priority Objectives

Objectives which establish the foundation for successfully implementing the RIM Strategy. They should be completed first.

Strategic Priority	Goal #	Goal	Objective #	Objective
RIM Governance	A1	To develop, implement, and sustain a RIM governance model	A1.1	Establish an Information Governance Committee (IGC)
			A1.2	Establish a new steering committee (a RIM/Privacy Steering Committee) and continue the existing IT Steering Committees
			A1.3	Establish a Corporate RIM/Privacy Liaison Group
			A1.4	Continue RIM responsibility under the City Clerk
			A1.5	Formally assign archival records responsibility to the City Clerk
	A2	To develop, implement, and regularly review a comprehensive suite of RIM/recordkeeping and RIM-related policies	A2.1	Develop and implement a RIM policy
			A2.2	Finalize and implement the draft recordkeeping policies
			A2.3	Develop and implement additional recordkeeping policies
	A3	To establish and sustain a staffing model to provide RIM expertise	A3.1	Establish a RIM Specialist position
			A3.2	Use internships, co-op placements, practicums, temporary employment contracts and/or engage consultants to provide the additional skill sets and/or capacity required to support corporate RIM program development and implementation
RIM Processes	B2	To manage information classification, search, retrieval and access	B2.3	Develop and implement a function-based records classification scheme
			B2.4	Develop and implement conventions for naming electronic files
	B4	To manage information storage	B4.2	Provide the necessary infrastructure (policy/procedures, technology, and training) before implementing any e-mail mailbox or file share storage quotas/limits
			B4.4	Plan and implement electronic records clean-up projects
			B5.7	Develop and implement short-term retention periods for network data back-ups
B6	To manage information retention and disposition	B6.1	Develop and implement a new <i>Records Retention By-law</i>	
RIM Communications and Training	C	To develop and implement RIM communications and training	C1	Develop and implement a RIM communications strategy
	D	To implement and sustain	D5	Implement a more robust ECM (enterprise content management)

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Strategic Priority	Goal #	Goal	Objective #	Objective
Technology		technology that supports the RIM program and to proactively address the RIM implications of technology		system to replace the EDMS and benefit from the expanded functionality of ECM technology

Figure 5 – Quick Win Objectives

Objectives with low implementation effort and cost. Implementation of these objectives will provide immediate benefit

Strategic Priority	Goal #	Goal	Objective #	Objective
RIM Processes	B3	To manage information sharing and collaboration	B3.1	Promote the use of the City's electronic collaboration resources
	B5	To manage information privacy, security, and protection from disaster	B5.2	Review and provide secure information destruction at all City facilities
			B5.3	Transfer funding for the shredding of paper records to the City Clerk's Office
			B5.5	Immediately stop loaning original by-laws
	B6	To manage information retention and disposition	B6.2	Implement an annual review and amendment of the <i>Records Retention By-law</i>
B6.5			Clarify the 'records hold' terminology and develop a formal process for placing and removing records holds	
Technology	D	To implement and sustain technology that supports the RIM program and to proactively address the RIM implications of technology	D4	Consider RIM principles when purchasing new software

Figure 6 – Medium Priority Objectives

Objectives not otherwise categorized.

Strategic Priority	Goal #	Goal	Objective #	Objective
RIM Governance	A2	To develop, implement, and regularly review a comprehensive suite of RIM/recordkeeping and RIM-related policies	A2.4	Review the RIM-related policies, revise them if/as required to (fully) address RIM implications, and implement the revised policies
			A2.5	Review RIM/recordkeeping and RIM-related policies every two years, revise them if/as required, and implement the revised policies
	A3	To establish and sustain a staffing model to provide RIM expertise	A3.3	Develop and implement a plan to provide additional resources every four years to offset the time the Program Manager, Information, Privacy and Elections will spend co-ordinating the municipal election event
	A4	To develop and implement a RIM compliance monitoring program	A4.1	Develop, implement, and periodically review measures to audit compliance with the RIM/recordkeeping policies
			A4.2	Develop, implement, and periodically review measures to audit compliance with the RIM aspects of other City policies
	RIM Processes	B1	To manage information creation, capture, and declaration	B1.1
B1.2				Determine the format in which records should be captured and implement those decisions
B2		To manage information classification, search, retrieval and access	B2.1	Review and assess information retrieval in Ernie/Infonet and implement improvements
			B2.2	Assess the feasibility of creating a central electronic repository to store documents/ records of interest, use, and/or benefit to all employees and implement the repository if feasible
B3		To manage information sharing and collaboration	B3.2	Explore the feasibility of introducing enhanced collaboration spaces and implement those spaces if feasible
B4		To manage information storage	B4.1	Investigate, recommend, and implement the location(s) in which inactive paper records will be stored in the future
			B4.3	Assess the adequacy of the RIM and privacy protection provisions in cloud applications and renegotiate those provisions to ensure the implementation of best practices if/where applicable
B5		To manage information privacy, security, and protection from	B5.1	Develop and implement an information security classification
			B5.4	Develop and implement a vital records program

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Strategic Priority	Goal #	Goal	Objective #	Objective
		disaster	B5.6	Develop, implement, and periodically test a comprehensive disaster recovery plan
	B6	To manage information retention and disposition	B6.3	Promote greater compliance with the <i>Records Retention By-law</i>
			B6.4	Investigate the capability of corporate applications to apply retention rules and implement the rules as soon as it is feasible.
			B6.6	Promote greater compliance with the records disposition process
B7	To manage archival records	B7.1	Identify, preserve, and make archival records accessible	
RIM Communications and Training	C	To develop and implement RIM communications and training	C2	Develop and regularly provide RIM training
Technology	D	To implement and sustain technology that supports the RIM program and to proactively address the RIM implications of technology	D1	Manage information/records on the public website according to RIM best practices
			D2	Manage information/records in social media content according to RIM best practices
			D3	Proactively identify and manage according to RIM best practices the RIM implications of future technologies

Figure 7 – Low Priority Objectives

Objectives whose implementation can be deferred until later in the 5 year implementation timeline with no negative effect.

Strategic Priority	Goal #	Goal	Objective #	Objective
RIM Processes	B7	To manage archival records	B7.2	Develop and implement a digital preservation strategy
Technology	D	To implement and sustain technology that supports the RIM program and to proactively address the RIM implications of technology	D6	Develop and implement a standards-compliant image management program

Implementation Costs

Staff time comprises a significant, but unquantifiable, cost for implementing many of the objectives in the RIM Strategy. In some cases, employees will be asked to do something new (e.g. attend RIM training, clean-up records, etc.). In other cases, they will be asked to do an existing task in a different way (e.g. file an electronic record in the corporate classification structure instead of their own *ad hoc* structure). No monetary compensation is anticipated for the performance of any new tasks. The allocation of employee time to new tasks or from inefficient, *ad hoc* RIM efforts to deliberate, targeted, and corporate RIM initiatives should increase overall productivity as time currently spent on inefficient and somewhat ineffective RIM-related activity is reallocated to the deliberately structured activities recommended in this report.

As identified in Section 5.4, the costs to implement several objectives (e.g. future inactive paper records storage) cannot be estimated at this time with any measure of reliability because they depend on progressing further with the implementation. For those objectives, the City will complete a detailed analysis/business case outlining the anticipated costs (both start-up and ongoing costs if/as required) and submit a budget expansion request for review and prioritization during the budget preparation process and subsequent consideration by Council. In terms of dollar value, the purchase, implementation, and maintenance of an enterprise content management (ECM) system constitutes the most costly objective for which costs cannot be estimated at this time.

It is similarly not possible at this time to estimate the compensation for co-op students, interns, practicum students, or temporary employees because those costs will depend on the scope of the requirements for such assistance (if any).

Because the hiring of a full-time RIM Specialist is crucial for completing many of the objectives, the estimated costs include the annual salary and compensation for that position. Implementation costs would be significantly higher if RIM specialists (i.e. consultants or other service providers) were retained to complete the work that would be assigned to the RIM Specialist. Estimated fees have, however, been included for an Archivist Consultant to prepare the archives strategy on the assumption that neither the Program Manager, Information, Privacy and Elections nor the RIM Specialist (to be hired) possess professional qualifications in archives.

Figure 8 lists the RIM strategy implementation costs which can be estimated reliably at this time.

Figure 8 – Estimated Implementation Costs

Item	Cost
RIM Specialist position (new)	\$66,000 - \$82,000/year + benefits
Archives Consultant to prepare archives strategy	\$12,000 - \$15,000
Purchase CGSB standards for records as documentary evidence	\$300
Estimated Total (5 Years)	\$390,300 - \$485,300 + benefits for RIM Specialist

Note: It is anticipated that existing administration budgets will fund office and meeting space, telecommunications, and printing (e.g. RIM training materials) expenses. Therefore, no amounts have been estimated for those expenses.

One cost savings is identified in the strategy. The implementation of shorter retention periods for network data back-ups is anticipated to result in a cost reduction as compared to the City's current \$64,000 (approx.) annual expense for back-up tapes (tape purchases, cleaning, and data writing) and the off-site storage and retrieval of those tapes.

2. Introduction

This section introduces the RIM Strategy project, describes the project's methodology, and defines key terms used in the strategy.

The City's need for a records and information management (RIM) strategy⁴ was first articulated in 2012 in the *Corporate Technology Strategic Plan*⁵:

"The development of a Records and Information Management (RIM) program for the City is a key recommendation of the IT Corporate Strategic Plan. In June 2012, Council approved funding to support the first phase of this program which will focus on the development of an inventory of City records and current record and information management practices. The findings of this assessment review will be used to inform the future development of a broad-based RIM strategy for the City. A RIM strategy will articulate the needs of the organization with respect to information management and will provide a roadmap for the future."

The City engaged Ergo Information Management Consulting (Ergo) to develop a five year RIM strategy to outline key phases and deliverables necessary for developing a holistic and integrated lifecycle approach to information management, including physical paper and electronic records from active to inactive and permanent retention, and establish a detailed roadmap for a corporate RIM program.

The RIM strategy project was announced to City staff when the Deputy CAO (Mark Amorosi) invited employees to complete the *Employee RIM Survey* in early 2015. That invitation described the RIM strategy project as follows:

"We need to develop a strategy that captures the current information management needs and issues faced by staff, as well as, the opportunities that you would like to see in the future as the Corporate RIM program evolves . . . The City recognizes there's a need to develop more sophisticated Records and Information Management (RIM) practices to ensure that information is efficiently managed and utilized . . . The strategy will establish a detailed roadmap clarifying where we are and where we should be going to create our Corporate RIM program at the City of Guelph. This involves looking at how we manage information in a variety of formats and storage locations, including paper and electronic records, emails, network drives and systems. Because a 'record' consists of any paper or electronic document used to conduct our day-to-day business, this study affects all of us and we need your help."

⁴ The absence of a RIM strategy at the City is not unusual. Two-thirds of the *Comparator Municipalities RIM Survey* respondents have not developed a RIM strategy.

⁵ City Clerk's Office, *Open Government Framework* (Committee Report # CHR-2012-55), *Attachment 1: A Survey of Open Government* [November 13, 2012].

2.1 Methodology

To support development of the RIM Strategy, Ergo completed a current environment assessment which included:

- Assessing the City's current RIM landscape by reviewing relevant City documentation/ data, surveying employees about their RIM practices and needs (22% survey response rate), and consulting with selected stakeholders about the RIM strategy and RIM program development.
- Using an online survey to document and assess the RIM trends and approaches of selected comparator municipalities (100% response rate) ⁶.
- Benchmarking the City's current RIM environment and practices against the *Generally Accepted Recordkeeping Principles*[®].
- Assessing the similarities and differences between the principles in the *Information Governance Maturity Model* and the document and content management requirements in *The DAMA Guide to the Data Management Body of Knowledge (DAMA-DMBOK Guide)*.

The RIM Strategy project was sponsored by the City Clerk and managed by the Program Manager, Information, Privacy and Elections (formerly the Records and Information Specialist).

The City also formed a Project Team to support this project. The Project Team reviewed and approved several project initiation documents (e.g. data collection instruments such as the *Comparator Municipalities RIM Survey*) and validated the findings of the current environment assessment⁷. The Project Team also reviewed and provided feedback on the RIM Strategy (this document) and the RIM Strategy Presentation to be delivered to the Corporate Management Team, Corporate Services Committee, and Council. The Project Team members were:

- Natasha Bagasar, Records Coordinator.
- Blair Labelle, General Manager, Technology Innovation.
- Tina McKinnon, Access, Privacy and Records Specialist (until April 24, 2015).
- Stephen O'Brien, City Clerk.
- Brigitte Roth, Quality Assurance Coordinator.
- Jennifer Slater, Program Manager, Information, Privacy and Elections (formerly the Records and Information Specialist).
- Sasha Tousignant, Manager of Projects and Service MMT.
- Scott Worsfold, Deputy City Solicitor.

⁶ The City selected the following municipalities as comparators and invited their Records Managers (or equivalents) to complete the survey: Barrie, Burlington, Cambridge, Greater Sudbury, Kingston, London, Toronto, and Vaughn.

⁷ The findings are provided in two separate volumes: a) *City of Guelph – Records and Information Management (RIM) Strategy – Current Environment Assessment, Volume 1: Findings Report*, and b) *City of Guelph – Records and Information Management (RIM) Strategy – Current Environment Assessment, Volume 2: Survey Reports*. Volume 2 provides the findings from the comparator municipalities RIM survey and the City's employee RIM survey.

2.2 Key Terms

The following key terms are used in the RIM Strategy.

Data: “Any symbols or characters that represent raw facts or figures and form the basis of information.”⁸

Data management: The “business function of planning for, controlling and delivering data and information assets” including “the disciplines of development, execution, and supervision of plans, policies, programs, projects, processes, practices and procedures that control, protect, deliver, and enhance the value of data and information assets.”⁹ Data management is known by many other terms such as information management (IM), data resource management (DRM), and information asset management (IAM).

Document: “recorded information or object which can be treated as a unit.”¹⁰

Information: “Data that has been given value through analysis, interpretation, or compilation in a meaningful form.”¹¹ Alternatively, it can be defined as “data in context.”¹²

Information governance (IG): “The specification of decision rights and an accountability framework to encourage desirable behavior in the valuation, creation, storage, use, archival and deletion of information. It includes the processes, roles, standards and metrics that ensure the effective and efficient use of information in enabling an organization to achieve its goals.”¹³

ARMA International defines ‘information governance’ slightly differently: “A strategic framework composed of standards, processes, roles, and metrics that hold organizations and individuals accountable to create, organize, secure, maintain, use, and dispose of information in ways that align with and contribute to the organization’s goals.”¹⁴

Information management (IM): “The administration of information, its use and transmission, and the application of theories and techniques of information science to create, modify, or improve information handling systems.”¹⁵

⁸ ARMA International, *Glossary of Records and Information Management Terms*, 4th edition, 2012.

⁹ *The DAMA Guide to the Data Management Body of Knowledge (DAMA-DMBOK Guide)*, 1st edition, 2010, c. 1.4.

¹⁰ International Organization for Standardization (ISO), *Information and documentation – Records Management – Part 1: General, ISO 15489-1:2001*, s. 3.10.

¹¹ ARMA International, *Glossary of Records and Information Management Terms*, 4th edition, 2012.

¹² *The DAMA Guide to the Data Management Body of Knowledge (DAMA-DMBOK Guide)*, 1st edition, 2010, c. 1.2.

¹³ Debra Logan, Gartner [2010] http://blogs.gartner.com/debra_logan/2010/01/11/what-is-information-governance-and-why-is-it-so-hard/

¹⁴ ARMA International, *Glossary of Records and Information Management Terms*, 4th ed., 2012.

¹⁵ Robek, Mary F., Gerald F. Brown, David O. Stephens, *Information and Records Management: Document-based Information Systems*, 4th edition, 1995.

Record: “information created, received, and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business.” See Appendix 2 for the characteristics of a record.

Records management (RM): the “field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records.”¹⁶

There is some similarity between that definition and a commonly accepted definition of ‘records and information management’ (or RIM): “The field of management responsible for establishing and implementing policies, systems, and procedures to capture, create, access, distribute, use, store, secure, retrieve, and ensure disposition of an organization’s records and information.”¹⁷

¹⁶ ISO 15489-1:2001, s. 3.16.

¹⁷ ARMA International, *Glossary of Records and Information Management Terms*, 4th edition, 2012.

3. Setting the Context for the City's RIM Strategy

A successful strategy takes into consideration the legislated environment in which an organization operates as well as the organization's structure and culture. A successful RIM Strategy is designed to ensure that an organization's records will be authentic, reliable, useable, and have integrity as required by the ISO 15489-1 records management standard.

This section provides:

- a) An overview of the legislated requirements that apply to the City's RIM practices (Section 3.1.1).
- b) A description of the RIM benchmarks against which the City's current RIM situation was assessed (Section 3.1.2).
- c) High-level findings from the comparator municipalities RIM survey (Section 3.1.3).
- d) An overview of the *DAMA-DMBOK Guide* (Section 3.1.4).
- e) Information about RIM's relationship to the City's strategic direction (Section 3.2.1).
- f) Aspects of the City's organizational structure and culture that were considered during the development of this strategic plan (Section 3.2.2).

3.1 Legislated RIM Requirements and Best Practices, and Benchmarking

This section describes the legislated requirements pertaining to the City's RIM functions and the RIM best practices on which the RIM Strategy is based.

3.1.1 Legislated RIM Requirements

Various laws govern the services/programs provided by an Ontario municipality. Many of those laws (or their regulations) also specify requirements for creating and managing the records of those services/programs. For example, Part III of the *Planning Act* (R.S.O. 1990, c. P.13) requires a municipality to prepare an official plan containing prescribed information and secure the plan's approval as a council by-law. In addition, the *Municipal Act, 2001* and the *Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)* specify over-arching requirements which apply to records – in any format or medium – in a municipality's custody or control. Those requirements are summarized below.

Municipal Act, 2001 (S.O. 2001, c. 25)

The *Municipal Act, 2001* defines a 'record' as "information however recorded or stored, whether in printed form, on film, by electronic means or otherwise, and includes documents, financial statements, minutes, accounts, correspondence, memoranda, plans, maps, drawings, photographs and films; ("document")" (s. 1.(1)). Therefore, the act's requirements for managing records apply not only to records in paper (hard copy) format and more traditional electronic formats (e.g. a word-processed document, an e-mail, etc.) but also to records in newer electronic formats such as website content and social media content (e.g. tweets, YouTube videos, Facebook posts, etc.).

A municipality is required to manage its records as follows:

1. Allow, subject to *MFIPPA* and at all reasonable times, inspection of the records¹⁸ under the control of the clerk (S. 253.(1)).
2. Provide, upon request and payment of the applicable fee, a certified copy under the municipality's seal of any record under the control of the clerk (S. 253.(2)).
3. Retain and preserve its records (and those of its local boards) in a secure and accessible manner (S. 254.(1)).
4. May destroy a record if a retention period for the record has been established and the retention period has expired, or the record is a copy of the original record (S. 255.(2)).
5. May, subject to the approval of the municipal auditor, establish retention periods during which its records (and those of its local boards) must be retained and preserved (S.255.(3)).

¹⁸ Those records are: a) by-laws and resolutions of the municipality and of its local boards; (b) minutes and proceedings of regular, special or committee meetings of the council or local board, whether the minutes and proceedings have been adopted or not; (c) records considered at a meeting, except those records considered during that part of a meeting that was closed to the public; (d) the records of the council; and (e) statements of remuneration and expenses prepared under section 284.

A municipality is also allowed to enter into an agreement for archival services with respect to the records it is required to retain and preserve under the act (S. 254.(3)). Should a municipality enter into such agreement, it retains – for the purposes of *MFIPPA* – ownership and control of the transferred records (S. 254.(4)) and must ensure that the transferred records are retained and preserved in a secure and accessible manner¹⁹ (S. 254.(6)).

Municipal Freedom of Information and Protection of Privacy Act (R.S.O. 1990, c. M.56)

Like the *Municipal Act, 2001*, the definition of a ‘record’ in the *Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)* is media-independent. *MFIPPA* defines a ‘record’ as:

“any record of information however recorded, whether in printed form, on film, by electronic means or otherwise, and includes, (a) correspondence, a memorandum, a book, a plan, a map, a drawing, a diagram, a pictorial or graphic work, a photograph, a film, a microfilm, a sound recording, a videotape, a machine readable record, any other documentary material, regardless of physical form or characteristics, and any copy thereof, and (b) subject to the regulations, any record that is capable of being produced from a machine readable record under the control of an institution by means of computer hardware and software or any other information storage equipment and technical expertise normally used by the institution; (“document”).
(S. 2.(1))

Part I of the act describes the access to records process, Part II governs the privacy of personal information, Part III describes the appeal process, and Part IV covers general matters such as fees and the Commissioner’s powers and duties.

There is a correlation between good RIM practices and meeting access to information obligations. In the words of Dr. Ann Cavoukian, Ontario’s past Information and Privacy Commissioner:

“poor records management can impede the public’s right to access important government-held information. In particular, a failure by government institutions to adhere to proper records management practices can have an adverse effect on the ability of individuals to scrutinize the activities of public bodies and to obtain information that is crucial to exercising their fundamental rights.”²⁰
and

“Good records management is an essential pillar that supports the FOI process in Ontario. The public’s statutory right to access government-held information cannot

¹⁹ As stated in S. 254.(9), “The requirement to retain and preserve records in an accessible manner means that the records can be retrieved within a reasonable time and that the records are in a format that allows the content of the records to be readily ascertained by a person inspecting the records.”

²⁰ Information and Privacy Commissioner/Ontario, *Electronic Records and Document Management Systems: A New Tool for Enhancing the Public’s Right to Access Government-Held Information?* [2003].

be fulfilled unless public servants properly document government programs and activities and maintain records in a well-organized manner.”²¹

Forthcoming²² amendments to *MFIPPA* will strengthen that relationship by requiring the preservation of records and expanding the list of offences under the act to include the alteration, concealment, or destruction of records. The forthcoming amendments are:

- a) “Every head of an institution shall ensure that reasonable measures respecting the records in the custody or under the control of the institution are developed, documented and put into place to preserve the records in accordance with any recordkeeping or records retention requirements, rules or policies, whether established under an Act or otherwise, that apply to the institution.” (S. 4.1)
- b) “No person shall “alter, conceal or destroy a record, or cause any other person to do so, with the intention of denying a right under this Act to access the record or the information contained in the record”. (S. 48.(1)(c.1))

In particular, the forthcoming amendment to Section 4.1 of the act requires the development and implementation of measures to ensure the appropriate preservation (retention) of records. Managing records retention is a key element of any RIM program.

²¹ Information and Privacy Commissioner/Ontario, *Electronic Records and Document Management Systems: A New Tool for Enhancing the Public’s Right to Access Government-Held Information?* [2003].

²² These amendments will come into effect on a day to be named by proclamation of the Lieutenant Governor of Ontario.

3.1.2 RIM Best Practices

This section describes the RIM best practises on which the RIM Strategy is based: the ISO 15489 Records Management Standard, the *Generally Accepted Recordkeeping Principles*®, and the *Information Governance Maturity Model*.

ISO 15489 Records Management Standard²³: The goals and objectives in the RIM Strategy are based on this standard which provides guidance on managing records – in all formats or media – created or received by organizations of all sizes in the public, private, and not-for-profit sectors. It is designed to “ensure that adequate records are created, captured and managed.”²⁴

Generally Accepted Recordkeeping Principles®: ARMA International (ARMA) developed the *Generally Accepted Recordkeeping Principles*® (*the Principles*) to “identify the critical hallmarks of information governance and provide both a standard of conduct for governing information and metrics by which to judge that conduct.”²⁵ *The Principles* apply to organizations of all sizes and in all sectors (private, public, and not-for-profit), and industries because they describe and measure fundamental attributes of information governance²⁶.

Information Governance Maturity Model: While *The Principles* provide a high-level, good practice framework, they do not address implementation details such as specific policies or technologies. Consequently, ARMA developed the *Information Governance Maturity Model (Maturity Model)* to provide “a more complete picture of what effective information governance is.”²⁷ Based on the *Principles* and the established body of standards, best practices and legal/regulatory requirements that surround information governance, the *Maturity Model* provides a tool by which organizations can benchmark their information governance maturity. The *Maturity Model* describes the typical characteristics of each of five levels²⁸ of maturity for each of the eight principles. The five maturity levels are:

- a) Level 1 (sub-standard): An environment where information governance (IG) and recordkeeping concerns are not addressed at all, are addressed minimally, or are addressed in an *ad hoc* manner. An organization at this level should be concerned that its IG program will not meet legal or regulatory scrutiny and may not effectively serve the organization’s business needs.

²³ International Organization for Standardization (ISO), *Information and documentation – Records Management – Part 1: General, ISO 15489-1:2001* provides the international standard and *ISO 15489-2:2001* is a technical report which provides further explanation and implementation options for achieving the outcomes in the standard.

²⁴ International Organization for Standardization (ISO), *Information and documentation – Records Management – Part 1: General, ISO 15489-1:2001*, s. 1.

²⁵ ARMA International, *Generally Accepted Recordkeeping Principles*® *Information Governance Maturity Model* www.arma.org/docs/bookstore/theprinciplesmaturitymodel.pdf

²⁶ When first published, *the Principles* were said to identify the critical hallmarks of ‘records and information management’.

²⁷ ARMA International, *Generally Accepted Recordkeeping Principles*® *Information Governance Maturity Model* www.arma.org/docs/bookstore/theprinciplesmaturitymodel.pdf

²⁸ *Ibid.*

- b) Level 2 (in development): An environment where there is a developing recognition that IG and prudent recordkeeping have an impact on the organization and that the organization may benefit from a more defined IG program. A Level 2 organization is still vulnerable to scrutiny of its legal or regulatory business requirements because its IG and recordkeeping practices are ill-defined, incomplete, nascent, or only marginally effective.
- c) Level 3 (essential): The minimum requirements that must be addressed to meet an organization's legal, regulatory, and business requirements. This level is characterized by defined policies and procedures and the implementation of processes specifically intended to improve IG and recordkeeping. A Level 3 organization may still be missing significant opportunities for streamlining business and controlling costs, but it has the basic key components of a sound program in place and is likely to be at least minimally compliant with legal, operational, and other responsibilities.
- d) Level 4 (proactive): A Level 4 organization has established a proactive IG program throughout its operations and has established continuous improvement for it. IG issues and considerations are routinely integrated into business decisions. An organization at this level should begin to pursue the additional business and productivity benefits it could achieve by increasing enterprise-wide information availability, mining its information for a better understanding of client needs, and otherwise transforming itself through increased use of its information.
- e) Level 5 (transformational): This level describes an organization that has integrated IG into its overall corporate infrastructure and business processes to such an extent that compliance with program requirements and legal, regulatory, and other responsibilities are routine. A Level 5 organization recognizes that effective IG plays a critical role in cost containment, competitive advantage, and client service, and it has successfully implemented strategies and tools to achieve these gains on a plenary basis.

Ergo used the *Maturity Model* to benchmark the City's current RIM environment and practices against the *Principles*[®], and identify areas of strength and opportunities for improvement. Our assessment was informed by our review of City documentation/data, the *Employee RIM Survey* findings, and consultations with various City stakeholders.

As shown in Figure 9, we propose a Level 3 (essential) target level for each principle because that is the minimum target level for all organizations: "Based on defined business needs and risk assessments, an organization may choose to target levels of maturity for each of the eight principles and for different areas of the organization. However, no entity should be satisfied with being at a maturity level of 1 or 2 in any area because this presents substantial risk to the overall organization."²⁹

²⁹ ARMA International, *Generally Accepted Recordkeeping Principles*[®] *Information Governance Maturity Model*
www.arma.org/docs/bookstore/theprinciplesmaturitymodel.pdf

Figure 9 – Benchmarking the City Against The Principles® Using the Information Governance Maturity Model

Principle	Definition	City's Current Level	City's Target Level
Accountability	A senior executive (or person of comparable authority) shall oversee the information governance program and delegate responsibility for RIM to appropriate individuals. The organization adopts policies and procedures to guide personnel and ensure that the program can be audited.	2	3
Transparency	An organization's business processes and activities, including its information governance program, shall be documented in an open and verifiable manner, and the documentation shall be available to all personnel and appropriate interested parties.	2	3
Integrity	An information governance program shall be constructed so the information generated by or managed for the organization has a reasonable and suitable guarantee of authenticity and reliability.	1	3
Protection	An information governance program shall be constructed to ensure a reasonable level of protection to records and information that are private, confidential, privileged, secret, classified, essential to business continuity, or that otherwise require protection.	1.5	3
Compliance	An information governance program shall be constructed to comply with applicable laws and other binding authorities, as well as with the organization's policies.	2	3
Availability	An organization shall maintain records and information in a manner that ensure timely, efficient, and accurate retrieval of needed information.	2	3
Retention	An organization shall maintain its records and information for an appropriate time, taking into account its legal, regulatory, fiscal, operational, and historical requirements.	2	3
Disposition	An organization shall provide secure and appropriate disposition for records and information that are no longer required to be maintained by applicable laws and the organization's policies.	2	3

Note: See Appendix 3 for the verbatim text of the *Maturity Model* and the rationale for our benchmarking rating for each principle.

The above ratings are illustrative, but should not overly alarm the City. These scores should be considered opportunities for the City to target and prioritize key areas for improvement. Indeed, many organizations with which we have worked started with comparable scores and are either working toward or have succeeded in attaining the Level 3 targets.

We also observed some notable strengths and opportunities to support the development, operation, and sustainability of a RIM program at the City:

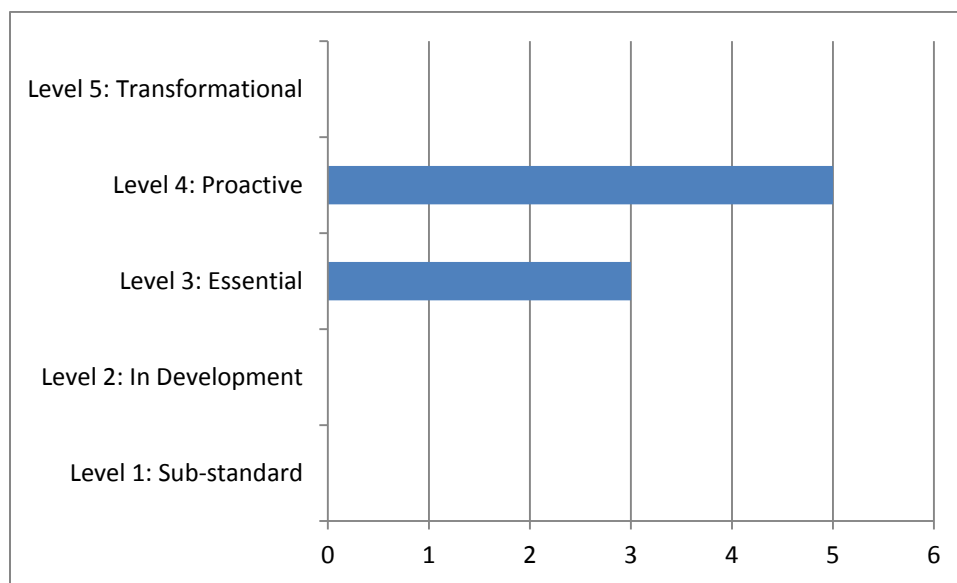
- Management interest in RIM, as demonstrated by the commissioning of this assessment.
- Higher awareness of RIM resulting from the *Records Inventory Assessment* and the recent *Employee RIM Survey*.

- Employee interest in RIM, as demonstrated by high levels of employee engagement during the data collection.
- The existence of some (draft) framework policies and tools which will provide a starting point for RIM program development and the establishment of standardized and defensible RIM practices.

3.1.3 Comparator Municipalities Benchmarking

Section 4 of this document contains several findings from the *Comparator Municipalities RIM Survey* to provide a counterpoint to the City's current RIM capacity and selected aspects of its current RIM practices. It is insightful, however, to consider how the comparator municipalities rated the maturity of their current (existing) RIM programs as compared to *the Principles®*. As shown in Figure 10 below, most respondents rated their RIM program at Level 3 (essential). The remaining respondents were split between Level 2 (in development) and Level 4 (proactive). The Program Manager, Information, Privacy and Elections rated the City's current RIM program at Level 2.

Figure 10 – Comparator Municipalities RIM Survey Benchmarking: Current Program Level



Respondents were also asked to rate the anticipated maturity of their municipality's RIM program in three years. The majority of respondents anticipate achieving a Level 4 (proactive) rating. In comparison, the City's Program Manager anticipates a one level increase to Level 3 (essential) within the next three years.

3.1.4 The DAMA-DMBOK Guide

The DAMA Guide to the Data Management Body of Knowledge (The DAMA-DMBOK Guide) provides a high-level overview of data management divided across ten major areas. Out of these ten areas, the one most closely analogous to RIM (and therefore most comparable to ISO 15489 and the *Generally Accepted Recordkeeping Principles*®) is ‘document and content management’.

While there is some similarity in the topics addressed by the *Generally Accepted Recordkeeping Principles*® and Chapter 10 – Document and Content Management in *The DAMA-DMBOK Guide*, the two resources are very different in their approach. The *Principles*® are designed as a tool to assist organizations in developing programs that comply with information governance standards. The *DAMA-DMBOK Guide* takes more of a textbook approach to describing different aspects of the document and content management component, and should be treated more as a reference guide.

Unlike the *Information Governance Maturity Model*, *The DAMA-DMBOK Guide* is not intended as a benchmarking tool, so it is more productive to use the *Information Governance Maturity Model* to benchmark RIM best practices. However, to the extent to which the City adopts *The DAMA-DMBOK Guide* as its guideline for overall data management practices (including document and content management), it is important for the City’s RIM practices to not conflict with *The DAMA-DMBOK Guide*.

By following the *Information Governance Maturity Model*, the City will ensure its RIM practices adhere to industry standards and will meet its goals, including compliance with the umbrella framework described in *The DAMA-DMBOK Guide*. However, the City may elect to conduct a secondary review of the RIM policies, procedures, and tools it will develop to support RIM program implementation to ensure those resources are aligned with *The DAMA-DMBOK Guide*.

The *RIM Strategy Current Environment Assessment: Volume 1 – Findings Report* provides a detailed assessment of the similarities and differences between the principles in the *Information Governance Maturity Model* and *The DAMA-DMBOK Guide* requirements for document and content management (Chapter 10 of the guide). Ergo reviewed the two resources to identify analogous items if/where applicable and highlight any major similarities or discrepancies between the two. This comparison may be useful should the City decide to conduct a review using *The DAMA-DMBOK Guide* in addition to using the *Principles* and the *Information Governance Maturity Model* to benchmark its RIM implementation.

3.2 Organizational Dynamics

This section discusses RIM in the context of the City’s overall strategic direction and identifies current organizational considerations relating to RIM.

3.2.1 RIM and the City’s Overall Strategic Direction

The City has identified three strategic focus areas and three strategic directions for each of these areas. As shown in Figure 11 below, improved RIM practices would support the City in achieving several of its strategic directions.

Figure 11 – Relationship of Improved RIM and the City’s Strategic Directions

Strategic Focus Area	Strategic Direction	Will Improved RIM Support Achievement of the Strategic Direction?
Organizational Excellence	1.1 Engage employees through excellence in leadership	
	1.2 Develop collaborative work teams and apply whole systems thinking to deliver creative solutions	Yes
	1.3 Build robust systems, structures and frameworks aligned to strategy	Yes
Innovation in Local Government	2.1 Build an adaptive environment for government innovation to ensure fiscal and service sustainability	
	2.2 Deliver public services better	Yes
	2.3 Ensure accountability, transparency and engagement	Yes
City Building	3.1 Ensure a well-designed, safe, inclusive, appealing and sustainable City	
	3.2 Be economically viable, resilient, diverse and attractive for business	
	3.3 Strengthen citizen and stakeholder engagement and communications	Yes

3.2.2 Current Organizational Considerations Relating to RIM

The *RIM Strategy Current Environment Assessment: Volume 1 – Findings Report* identified several aspects of the City's organizational structure and culture which should be considered when developing the RIM strategy. Those aspects are:

1. Service area/department expectations for input/participation in corporate initiatives

Several stakeholders, particularly City Clerk's Office staff, noted that service areas/departments often expect to be given an opportunity to input on the development/revision of corporate policies, procedures, programs, etc.

2. Perception that service areas/departments may have different needs

Many employees (and particularly those working at locations other than City Hall) perceive that the needs of their service area/department differ from the rest of the organization. This often translates into requests to modify corporate requirements or opt out of them entirely. This tendency will have to be acknowledged and managed during RIM program development and delivery.

3. Many long-term employees are retiring

Like many (municipal government) organizations, many long-term employees are eligible to retire over the next few years. According to the City's Human Resources Department, 23% of the City's workforce is eligible to retire with unreduced pensions over the next 5 years with Fire GPPFA, Transit, CUPE 241, and NUME being the areas expecting the largest impact from retirement³⁰. If processes are not put in place to capture and ensure easy access – upon authorized request – to the records they created/received and maintained prior to their departure, the City risks losing access to a significant volume of its corporate memory with resulting loss of efficiency or reduced access to information.

4. Information is not viewed by everyone as a corporate asset and the concept of 'records and information management' is not widely understood

Information is an asset, just like finances, human resources, and capital infrastructure; however, it is doubtful that all employees share that view. Further, 'records and information management' may be a nebulous concept for some employees, senior managers, and Councillors. Any RIM initiatives should include dedicated effort towards positioning information as a corporate asset, defining RIM, addressing RIM misconceptions (e.g. RIM is only for paper records), building good RIM practices into business processes, and demonstrating the benefit of good RIM practices to both the City and individual employees.

³⁰ The employee groups who create/use records most frequently in their jobs are likely NUME (both Management and Non-Management) and Inside CUPE 973.

5. Lack of an open and collaborative organizational culture

Although specific to the City's current state with respect to Open Government, this observation and the statements below (taken from the *City of Guelph Open Government Action Plan Initiative, Interim Report*) are pertinent for strategy development in general, including the RIM Strategy.

"The organizational environmental scan revealed a hierarchical and siloed culture where strategic plans were often created with limited involvement from the stakeholders, yet those same stakeholders are expected to realize the strategies without resource support."³¹

"While there is a healthy level of advocacy for Open Government within the organization, Delvinia also heard skepticism, particularly from the operational groups, towards organizational change. The skepticism is due to poor change management practices and results with past initiatives. Some stakeholders conveyed that strategies were often created without their involvement yet they are expected to realize the strategies without resource support. As a result, the Open Government project is suffering from a deficit of trust among employees. This suggests a hierarchical culture and poor change management practices and highlights the opportunity for further collaborative planning and prioritization of initiatives across the organization."³²

6. RIM, privacy, and IT are not often considered when service areas/departments procure systems

Every system will create and store data/documents/records. RIM, privacy, and IT assistance is often not sought at the planning stage resulting in the procurement of a system which presumably satisfies a service area/department's operational requirements but which may fail to consider RIM (e.g. retention and disposition), privacy, or IT (e.g. data warehouse) requirements. That places RIM, privacy, and IT in the unfortunate position of having to try to retroactively implement the necessary requirements and best practices.

7. The RIM strategy will fail if it is not appropriately resourced

In discussions with key stakeholders, insufficient (senior) management support, lack of employee engagement, lack of staff time/sufficient staff resources, and lack of training and support were the most commonly cited impediments to successfully implementing the RIM strategy.

³¹ Delvinia, *City of Guelph Open Government Action Plan Initiative, Interim Report* [February 27, 2014].

³² *Ibid.*

4. RIM Assessment Findings Summary and Gap Analysis

Ergo reviewed and assessed the City's current RIM environment in terms of governance, staffing, practices (e.g. information classification, retention, etc.), management of new/emerging information formats or storage locations, employee training and communications, and compliance. Ergo also reviewed the City's computing environment and technologies for managing information, its data management practices, and its open government initiative.

Two benchmarking exercises were also completed: a benchmarking of the City's current RIM environment and practices against the *Generally Accepted Recordkeeping Principles*[®], and an assessment of the similarities and differences between the principles in the *Information Governance Maturity Model* and the document and content management requirements in *The DAMA Guide to the Data Management Body of Knowledge (DAMA-DMBOK Guide)*.

This section describes the City's current RIM environment at a high level. Deficiencies (gaps and risks) in the current state are identified and recommendations are provided to achieve the desired future state. While some of the recommendations address the actions required to mitigate a noted deficiency, others provide best practices for the City's consideration. An action plan is provided in Section 5.2 for implementing each recommendation.

Note: See the *RIM Strategy Current Environment Assessment: Volume 1* for detailed information about the City's current RIM environment and the *RIM Strategy Current Environment Assessment: Volume 2 – Survey Reports* for the complete summary report for each of the *Comparator Municipalities RIM Survey* and the *Employee RIM Survey*.

4.1 RIM Governance

Governance may be defined simply as a means of determining “who has power, who makes decisions, how other players make their voice heard and how account is rendered.”³³

Governance requires qualified individuals to support effective decision-making, the establishment of policies, and the continuous monitoring of their proper implementation. The RIM Strategy presents ‘RIM governance’ as an umbrella term encompassing four elements:

- a) RIM governance model: Management structure for ongoing RIM guidance and support.
- b) RIM policy: Policy framework for the adoption of good RIM practices.
- c) RIM staffing: Staffing required to support the RIM Strategy's implementation.
- d) RIM compliance: Processes to monitor and report on RIM policy implementation.

³³ Institute on Governance, Defining Governance – What is Governance? <http://iog.ca/defining-governance/>

4.1.1 RIM Governance Model

This section describes the City's current RIM governance structure and presents a desired future state for a more comprehensive RIM governance model.

Current State:

RIM Responsibility: The *Records Retention By-law* assigns to the City Clerk (or designate) the responsibility to “develop and administer policies and processes for the City’s Records and Information Management Program”. That responsibility assignment is in keeping with many other Ontario municipalities and 100% of the *Comparator Municipalities RIM Survey* respondents. The by-law specifically calls out the responsibility of the City Clerk (or designate) for several records retention and disposition activities such as ensuring that final business records are kept and disposed of in accordance with the by-law.

Although not specifically referenced in the *Records Retention By-law*, the City Clerk is also presumably responsible for the City’s archival records. The assignment of archival records responsibility to a City Clerk is also common in other Ontario municipalities, including 75% of the municipalities which responded to the *Comparator Municipalities RIM Survey*.

In keeping with many other Ontario municipalities and all *Comparator Municipalities RIM Survey* respondents, the City Clerk’s Office is responsible for the related functions of information access (including administration of the City’s program for responding to requests under *MFIPPA*) and information privacy (under *MFIPPA* and the *Personal Health Information Protection Act*).

The draft *Electronic Data Retention Policy* states that Information Technology Services is responsible – in agreement with the City Clerk – for “the implementation of systems that automatically categorize, archive, and delete data based on their creation/modified date.”³⁴

Deficiencies:

- Responsibility for archival records is not formally assigned

RIM Committees: Many Ontario municipalities (including almost two-thirds of *Comparator Municipalities RIM Survey* respondents) have established at least one committee to support RIM program delivery such as a Records Retention Committee to oversee retention schedule revisions or a RIM Liaison Committee to serve as a clearinghouse for both departmental/divisional RIM concerns and corporate RIM initiatives. The City has not established any RIM committees; however, the Information Technology Governance Committee (ITGC) provides high-level coordination, strategic priorities, and oversight for IT delivery. ITGC membership includes service area/department representatives.

³⁴ City of Guelph – Information Technology Services, *Electronic Data Retention Policy* [draft, February 20, 2015].

An Information Management Steering Committee was established to oversee “the City’s coordinated Information Management Strategy and implementation plans.”³⁵ At its inaugural May 29, 2013 meeting, the committee³⁶ discussed information management (IM) and reviewed the committee’s proposed duties:

- Work collaboratively to define the City’s IM needs and requirements.
- Identify and prioritize IM-based initiatives by developing a three-year strategy, including budget and resource plans over the subsequent three-year period.
- Recommend an IM strategy to the IT Governance Committee.
- Review and refresh IM strategy at appropriate intervals.
- Oversee and participate in the delivery of IM work plan projects and initiatives.
- Receive project status reports on key projects and assist in resolving issues and risks.
- Monitor and adjust work plans as necessary to react to changing needs and priorities.
- Establish standards, policies, guidelines, procedures and best practices for IM (e.g. retention, storage, metadata, accessibility).
- Promote and evangelize IM.
- Keep informed and up-to-date about IM best practices.³⁷

Although meetings (60-90 minutes each) were anticipated to be held every six to eight weeks, the Information Management Steering Committee members decided at the inaugural meeting to defer any future meetings until IM was more clearly defined and the committee’s scope/mandate had been clarified.

Deficiencies:

- No City committee(s) to support RIM program delivery
- Indefinite deferral of future IM Steering Committee meetings
- Service areas/departments do not participate in RIM governance; however, they are responsible for managing the records they create/receive

³⁵ City of Guelph, *IT Governance Framework*, Section 7 – Terms of Reference for IT Governance Bodies [March 22, 2013].

³⁶ The committee includes both management (6 employees, including the City Clerk as Chair) and IT representation (7 employees).

³⁷ City of Guelph, *IT Governance Framework*, Section 7 – Terms of Reference for IT Governance Bodies [March 22, 2013].

Desired Future State:

1. The City will establish an Information Governance Committee (IGC) to provide oversight for information management.

The City defines 'information management' as "the collection and management of information from various sources and in many formats. It involves the organization, control, structure, processes, and access or delivery of information to different types of audiences or users."³⁸ The City views RIM, knowledge management, and data management as areas within information management.

To provide an overarching, strategic, and collaborative approach for governing all types of information and for co-ordinating the discrete functions that make up information management, organizations are starting to implement 'information governance' structures. Information governance can be defined as "the specification of decision rights and an accountability framework to encourage desirable behavior in the valuation, creation, storage, use, archival and deletion of information. It includes the processes, roles, standards and metrics that ensure the effective and efficient use of information in enabling an organization to achieve its goals."³⁹

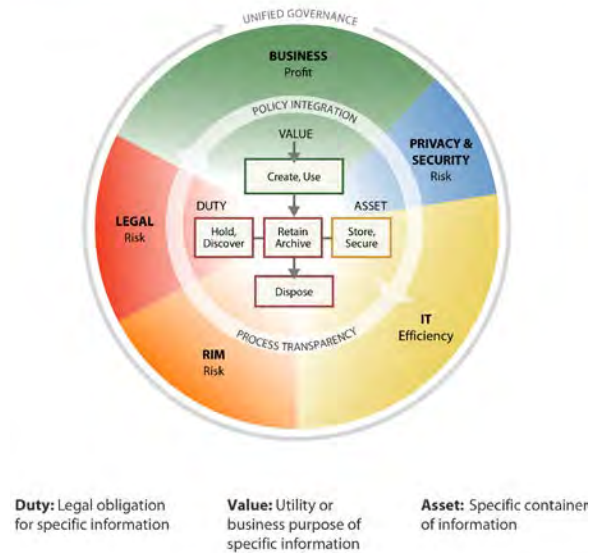
The Information Governance Reference Model (see Figure 12) graphically illustrates a holistic and integrated framework for information governance which requires the active participation of several, equally weighted stakeholders. RIM is one of those stakeholders. The others are IT, Legal, Privacy and Security, and the Business.

³⁸ City of Guelph, *Employee RIM Survey* [January 2015].

³⁹ Debra Logan, Gartner [2010] http://blogs.gartner.com/debra_logan/2010/01/11/what-is-information-governance-and-why-is-it-so-hard/

Figure 12 – Information Governance Reference Model

Information Governance Reference Model (IGRM)
Linking duty + value to information asset = efficient, effective management



Information Governance Reference Model / © 2012 / v3.0 / edim.net

The establishment of an Information Governance Committee (IGC) is recommended to provide high-level strategic priorities, oversight, and coordination for managing all of the City's information assets. Its establishment will provide a formal governance structure to link RIM with the City's other information management functions (e.g. data management) and initiatives (e.g. open government), and promote collaboration to ensure information is consistently managed. By focusing on the governance of information, the City will embrace a more integrated, enterprise approach to managing information.

The IGC will ensure the City's policies, procedures, practices, and technologies for managing information (or which affect the management of information) meet business needs while also complying with legislated/regulated requirements and both managing and mitigating risk. Therefore, the IGC will own and manage the RIM strategy and the corporate IT strategy, thus having oversight not only for the City's information but also the technologies which create/receive and store information. Specifically regarding RIM, the IGC will provide advice, guidance, and oversight during RIM program development and implementation.

The following IGC voting membership – based on the ITGC's current membership – is recommended. Proposed additional positions are identified below as '(new)'.

- a) RIM and Privacy: City Clerk (new).

- b) IT: General Manager of Technology Innovation.
- c) Legal: City Solicitor (new).
- d) Business:
 - o Deputy CAO of Corporate Services (Chair).
 - o Member of the Executive Team (Alternate Chair).
 - o General Manager Finance/Treasurer.
 - o 2 General Managers/Managers (annual rotations).
 - o Steering Committee Chairs (RIM/Privacy Steering Committee Chair and Chair of each IT Steering Committee).

See Appendix 6 for the proposed IGC framework/terms of reference.

Note: Because the IGC will assume the current responsibilities of the Information Technology Governance Committee (ITGC), the ITGC will be discontinued upon the IGC's establishment.

2. The City will establish a new steering committee (a RIM/Privacy Steering Committee) and continue the existing IT Steering Committees.

While RIM, Privacy, and IT are IG stakeholders, they also have their own defined areas of responsibility. Modelled on the Steering Committees which currently support the ITGC, the RIM/Privacy Steering Committee and the IT Steering Committees will be responsible for developing and implementing multi-year work plans to support the execution of the strategies overseen by the IGC. Where applicable, these committees will also review and give feedback on draft policies, procedures, training presentations, etc.

The RIM/Privacy Steering Committee will support the development, implementation, and sustainability of the City's RIM program and the City's access to information/privacy program. The Committee will operate strategically to develop corporately agreed approaches to RIM program delivery to ensure that all corporate effort is aligned, that RIM services meet wider corporate objectives, and that benefit can be widely shared. Led by the Program Manager, Information, Privacy and Elections, the RIM/Privacy Steering Committee will include 8-10 employees from City service areas/departments (representatives of the RIM program client base and employees responsible for responding to freedom of information requests and dealing with privacy matters). Each employee representative will serve a one year term and appointments will be rotated across the service areas/departments. See Appendix 6 for information on the RIM/Privacy Committee's general duties, membership, and meeting logistics.

IT Steering Committees will continue to be configured around major enterprise systems (Amanda, CLASS, ERP, GIS, WAM) and major work programs (such as web and online services). The Program Manager, Information, Privacy and Elections will be a RIM and access to information/privacy resource for these committees. The mandate and general duties of these steering committees will remain unchanged as compared to the current

framework under the ITGC. See Appendix 6 for more information about the general duties, membership, and meeting logistics of the IT Steering Committees.

3. The City will establish a Corporate RIM/Privacy Liaison Group.

Service areas/departments are responsible for managing the records they create/ receive in compliance with City policies and the *Municipal Freedom of Information and Protection of Privacy Act*. By establishing this liaison group (one representative per service area/department), the City will establish a formal mechanism for soliciting input regarding the RIM strategy's implementation, a conduit for sharing information about the implementation and future RIM program/ privacy services, and – hopefully – a network that will take leadership of and demonstrate support for the RIM strategy's implementation within individual service areas/departments. Employees (one per service area/department) whose responsibilities include RIM and privacy will be appointed by the Information Governance Committee. Chaired by the Program Manager, Information, Privacy and Elections, the group will submit feedback and recommendations to the RIM/Privacy Steering Committee.

4. The City Clerk will continue to be responsible for RIM.

The accountability principle in the *Generally Accepted Recordkeeping Principles*[®] states “An organization shall assign a senior executive who will oversee a recordkeeping program and delegate responsibility to appropriate individuals, adopt policies and procedures to guide personnel, and ensure auditability.”⁴⁰ Specifically, the senior executive is required to establish both a method to design and implement a structure to support the recordkeeping program, and a governance structure for the program's development and implementation. The senior executive is also required to ensure the recordkeeping program has documented and approved policies and procedures to guide its implementation. It must also be possible to audit the program (which is updated as appropriate) so it can validate its mission.

Continued assignment of RIM responsibility to the City Clerk is recommended because:

- The City Clerk is a senior-level position with access to other senior managers to facilitate RIM program implementation across the City.
- RIM is an organization-wide function for which centralized, high-profile control is required to establish legally defensible requirements and standardized best practices to be implemented by all employees.
- The City Clerk's legislated responsibilities for certain records under the *Municipal Act, 2001* provide a basis for extending those responsibilities to all City records.

⁴⁰ ARMA International, *Generally Accepted Recordkeeping Principles* www.arma.org/r2/generally-accepted-br-recordkeeping-principles/accountability

- In most Ontario municipalities, including 100% of the comparator municipalities surveyed, RIM program responsibility is assigned to the City Clerk.

It is recommended that the City's RIM program be client-driven, based not so much on one individual or group having direct control of the records, but rather on effective communication of requirements, best practices, client-focused training, and the provision of expert advisory services. Therefore, the RIM function should focus on strategy, planning, and client support based on a system of voluntary compliance, education, quality service, and responsible enforcement. Service areas/departments should continue to be responsible for the day-to-day management of the records in their custody or control in compliance with applicable City policies and legislation.

5. The City will formally assign archival records responsibility to the City Clerk.

Records are disposed of when they reach the end of their approved retention period. Most records are disposed of by destruction (i.e. shredding of paper records and deletion of electronic ones); however, records of historical merit should be transferred to an archives to ensure their preservation and future accessibility. Given the City Clerk's responsibility for RIM and, specifically, records retention and disposition under the *Records Retention By-law*, it would be appropriate to assign archival records responsibility to the City Clerk. That assignment would also be in keeping with the practices of many other municipalities.

4.1.2 RIM Policy

This section describes the City's current RIM and RIM-related policy framework and presents a desired future state.

Current State:

A RIM Policy: Most municipalities (and three-quarters of *Comparator Municipalities RIM Survey* respondents) have one policy which sets out RIM accountabilities and responsibilities, and the municipality's overall requirements for managing records. The City has drafted – but not implemented – two RIM policies:

- A *Records Management Policy* (2012)⁴¹ stating the City's intention to implement a corporate RIM program which will “apply to all records in the custody and under the control of Council, Committees, City administration and Local Boards of the City of Guelph”⁴². The draft policy also describes the RIM program's purpose, how the program will be implemented, and assigns to the City Clerk responsibility for both RIM program administration and the development and maintenance of a program manual.
- The *Corporate Recordkeeping Policy* (2014) was drafted to “define and establish requirements for the creation, management, retention and disposal of business records to support City of Guelph business functions and activities.”⁴³ It sets out several objectives such as enabling effective decision-making by making information more efficient to locate. The draft is incomplete, containing only placeholders for several sections such as roles and responsibilities, and mandatory requirements such as the classification of records.

Deficiencies:

- No policy has been implemented to document RIM accountabilities and responsibilities, and the City's requirements for managing records
- Employees lack direction in managing records (the *Records Retention By-law* does, however, provide retention and disposition direction)

Recordkeeping Policies: In addition to the RIM policy described above, most organizations develop and implement additional policies to manage different recordkeeping activities. The City has drafted or implemented policies/by-laws for the following recordkeeping activities:

- a) Access to information: draft *Routine Disclosure Policy*.

⁴¹ At the direction of the previous City Clerk, finalization of this policy was put on hold pending completion of the RIM strategy.

⁴² City Clerk's Office, *Records Management Policy*, draft [2012].

⁴³ City Clerk's Office, *Corporate Recordkeeping Policy*, draft [2014].

- b) Retention and disposition: *Records Retention By-law* (see Section 4.2.6 for more information and for recommendations regarding the future state of records retention and disposition).
- c) Retention and disposition of electronic data: draft *Electronic Data Retention Policy*.
- d) Privacy: draft *Privacy Policy*.

To date, the City has not drafted or implemented policies for activities such as information security, records hold, or the EDMS (electronic document management system). In addition, it is anticipated that RIM Strategy implementation will necessitate the development of additional policies (or the revision of existing policies) to address new/expanded recordkeeping activities (e.g. an archives policy).

Employee RIM Survey respondents were asked to rank their interest in clarification or the creation of policies/processes in five areas. They expressed greatest interest in e-mail management (84%) followed by knowledge transfer (for incoming and/or outgoing staff) at 81%, information sharing with the City and information disclosure to the public (tied at 67% each), and cloud information storage/sharing applications at 65%.

Deficiencies:

- No comprehensive suite of policies to address all recordkeeping activities
- Some policies are only at the draft stage

RIM-related Policies: The City has drafted or implemented several policies which involve or affect recordkeeping. For example, the *Clean Desk Policy* specifies “workplace practices for employees to follow to keep paper and electronic records secure and prevent unauthorized access”⁴⁴ and the *Video Surveillance Policy*⁴⁵ specifies a process for copying, releasing, retaining, and destroying video surveillance records. Some policies address the use of technologies which create/transmit or store information but do not (fully) address the RIM implications of those technologies. For example:

- a) The *Responsible Computing Policy* states that e-mail messages (and their attachments) are City property; however, the policy does not specify how employees should manage e-mail records (e.g. classification, retention, etc.).
- b) The draft *Bring Your Own Device (BYOD) – Policy and Rules of Behavior* “defines accepted practices, responsibilities and procedures for the use of personally-owned Mobile Devices that the City authorizes to connect to corporate systems.”⁴⁶ The policy

⁴⁴ Information Services, *Clean Desk Policy* [August 26, 2009].

⁴⁵ As of the writing of this report, the City Clerk’s Office was preparing a draft revised policy.

⁴⁶ Information Technology Services, *Bring Your Own Device (BYOD) – Policy and Rules of Behavior* [draft, undated].

does not direct employees in managing the records created by, transmitted using, or stored by a BYOD device.

- c) The *Social Media Guidelines for Employees* and the *Social Media Guidelines for Elected Officials* address topics such as the importance of maintaining confidentiality and privacy; however, they do not direct employees in managing social media content which constitutes a City record.

Deficiencies:

- Some technology use policies (both draft and implemented) do not (fully) address RIM implications

Desired Future State:

1. The City will develop and implement a RIM policy.

The RIM Policy would establish an organization-wide program for the lifecycle management of all City records. The policy would describe the importance and value of records and specify requirements for their management (e.g. classification, retention, security, etc.). It would also assign RIM responsibilities and accountabilities to several stakeholder groups (e.g. executive management, managers/supervisors in service areas/departments, all employees, etc.). This foundational policy would be supported by specific recordkeeping and RIM-related policies.

2. The City will finalize and implement the draft recordkeeping policies.

The City will finalize the draft *Routine Disclosure Policy*, draft *Electronic Data Retention Policy*, and draft *Privacy Policy*.

3. The City will develop and implement additional recordkeeping policies.

The City will develop and implement additional recordkeeping policies to support initial RIM program implementation. Those additional policies are: an *Information Security Policy*, a *Records Hold Policy*, and an *EDMS Policy*. As the RIM program is implemented, additional policies will be developed (e.g. an *Archives Policy* to direct the management of the City's archival records).

4. The City will review its RIM-related policies, revise them if/as required to (fully) address RIM implications, and implement the revised policies.

To ensure a holistic, best practices approach in its recorded information management practices, the City will undertake a review of its RIM-related policies and revise them

if/as required to address (or more fully address) RIM implications such as information classification, retention, and security. For example, the draft *Bring Your Own Device (BYOD) – Policy and Rules of Behavior* would be revised to direct employees in managing the records created by, transmitted using, or stored by a BYOD device.

5. The City will review its RIM/recordkeeping and RIM-related policies every two years and revise them if/as required.

All policies which support the RIM program or which involve or affect recordkeeping should be reviewed every two years and revised if/as required to ensure they continue to reflect business and technology needs, and legislated requirements if/as applicable.

4.1.3 RIM Staffing

This section describes the City's current RIM staffing and presents a desired future state.

Current State:

Corporate RIM Staffing: Following the April 2015 resignation of the Access, Privacy and Records Specialist, the City Clerk's Office converted that permanent position to a new position (the Program Manager, Information, Privacy and Elections position) and discontinued the contract Records and Information Specialist position. The incumbent Records and Information Specialist was subsequently promoted to the new Program Manager position. The benefits of this conversion and recruitment from a RIM perspective include:

- Providing permanent, full-time program management for the RIM and access to information/privacy functions.
- Providing continuity for those functions given the incumbent Program Manager's prior responsibility for RIM and past experience in providing back-up for the Access, Privacy and Records Specialist position, particularly for the processing of access to information requests in the Access, Privacy and Records Specialist's absence.

The downside is that the responsibilities of two full-time positions have been transferred to one position. Further, responsibility for co-ordinating the municipal election event every four years is anticipated to require the Program Manager's attention on a full-time basis for the 7-8 months immediately prior to an election and on a part-time basis for the 6-8 months immediately prior to that period as election planning commences⁴⁷. Without additional resources, and particularly during the year prior to each municipal election event, the Program Manager will be unable to execute all of the position responsibilities. The City Clerk's Office recognizes the need for additional resources and hopes to secure one additional position during 2016 budget deliberations to support the Program Manager.

The Program Manager is responsible for the City's RIM function which supports more than 1,200 employees. As indicated in Figure 13 below, the results of the *Comparator Municipalities RIM Survey* reveal considerable variation in the number of full-time RIM positions as compared to the number of employees supported by a municipality's RIM function⁴⁸.

⁴⁷ By way of comparison, the secondment of the Records and Information Specialist to work full-time on the municipal election event for much of 2014 limited the Specialist's ability to deliver RIM services. It was also necessary to defer the commencement of the RIM Strategy project until after that election.

⁴⁸ Respondents were instructed to omit full-time equivalents such as records coordinators/liaisons in other departments unless those positions are funded by their municipality's RIM program budget.

Figure 13 – FTE RIM Program Positions vs. Number of Employees Supported (n=8)

Number of Employees Supported by the RIM Program	Number of Full-time RIM Program Positions
401 – 600	3
601 – 800	1
801 – 1,000	3
1,001 – 1,200	7
1,201 – 1,400	3
1,801 – 2,000	5
2,001 or more	One municipality in this category reported 2 position while the second municipality in this category reported 97 positions

It is anticipated that additional skill sets and positions (e.g. Archivist, ECM Project Manager, etc.) will be required at various points during implementation of the RIM Strategy.

Deficiencies:

- Insufficient staffing to support the RIM and access to information/privacy functions, particularly the multi-year implementation of the RIM Strategy
- Inability of the Program Manager to execute all RIM and access to information/privacy responsibilities in an election year

Service Area/Departmental RIM Staffing: It is anticipated that many of the City’s administrative positions have some RIM responsibility, most likely for maintaining centrally stored paper files. Two service areas/departments have positions with significant RIM responsibility: the duties of the Records Clerk in the Operations Department include maintaining the department’s central files and the duties of the Records Coordinator in Building Services include, but are not limited to, creating and maintaining all property files for the department (including Planning and Engineering), establishing RIM policies and procedures for the department, and serving as the department’s representative in corporate RIM initiatives. The corporate RIM function does not provide a different/higher level of support or guidance for those positions as compared to other positions at the City.

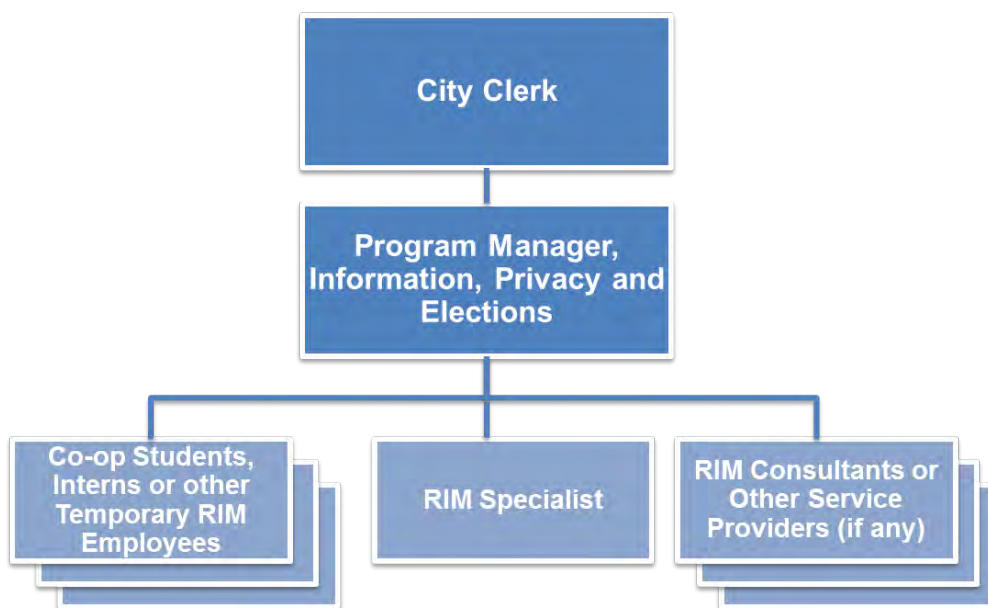
Deficiencies:

- N/A

Desired Future State:

The desired future state assumes the corporate RIM staffing model in Figure 14 below.

Figure 14 – Proposed Corporate RIM Staffing Model



1. The City will establish a RIM Specialist position.

The establishment of this position and the recruitment of an appropriately qualified individual are critical for the successful implementation of the RIM strategy.

The RIM Specialist will support the Program Manager, Information, Privacy and Elections in the development and implementation of the corporate RIM program, and in the delivery of access to information/privacy services and programs. This will be a full-time, non-union position⁴⁹. It is anticipated that the position will be rated at the same

⁴⁹ A non-union position is recommended because the RIM Specialist will work in a confidential advisory and planning capacity, and handle confidential information. Positions of this type are non-union at some Ontario municipalities, including 2 of the 8 comparator municipalities which have a similar position of (Senior) Records/Information Analyst. Further, there is City precedent for the RIM Specialist to be a non-union position since it incorporates duties from two non-union positions in the City Clerk's Office (i.e. the Records and Information Management Specialist and the Access, Privacy and Records Specialist) which were discontinued in June 2015.

level as the now discontinued Records and Information Specialist position. A proposed position summary, duties, and qualifications for the RIM Specialist position are provided in Appendix 4.

Ideally, this position will be a permanent position. If it is not possible to secure permanent status at this time, the position should be filled on a contract basis (minimum one year to provide continuity).

- 2. The City will use internships, co-op placements, practicums, temporary employment contracts and/or engage consultants to provide the additional skill sets and/or capacity required to support corporate RIM program development and implementation.**

Graduate students studying RIM are available throughout the year through a paid co-op program (Western University, Faculty of Information and Media Studies) and through paid summer internships (University of Toronto, Faculty of Information). The University of Toronto also offers the Information Professional Practicum program whereby students are available during the school year for placements that should take the equivalent of at least three weeks of full-time work (i.e. 105 hours). Beginning in fall 2015, University of Toronto students enrolled in the Master of Information Co-op Option will be available to complete two consecutive 12-week work terms in a full-time paid role. The City may also be successful in recruiting temporary employees for specific projects (e.g. ECM Project Manager). The City could also engage consultants (e.g. a consulting Archivist to develop the archives strategy) in addition to or instead of using co-op placements/internships/practicums/temporary employment contracts.

- 3. The City will plan to offset with additional resources the time the Program Manager, Information, Privacy and Elections will spend each fourth year co-ordinating the municipal election event.**

It is anticipated that co-ordinating the municipal election will require the Program Manager's attention on a full-time basis for the 7-8 months immediately prior to an election and on a part-time basis for the 6-8 months immediately prior to that period as election planning commences. Consequently, the Program Manager will have significantly less time to spend on RIM or access to information/privacy duties for several months prior to each election. If additional resources are not provided to offset that time reduction, particularly in the 7-8 months immediately prior to an election, it will be impossible to complete all regularly assigned RIM and access to information/privacy tasks in the run-up to a municipal election. Tasks which will remain undone unless offset will be identified in the annual RIM program and access to information/privacy work plan. The RIM Specialist may be able to take on some of those tasks; however, additional capacity from external sources will also be required. Thus, the City should plan to retain suitably qualified additional resources for 8-12 months every fourth year.

4.1.4 RIM Compliance

This section describes the City's current RIM compliance environment and the desired future state.

Current State:

Compliance with RIM Policy/Recordkeeping Policies: As previously stated, the City does not have a RIM policy. The City does, however, have several recordkeeping policies such as a records retention schedule. The City does not currently audit compliance with any of its recordkeeping policies.

By way of comparison, most *Comparator Municipalities RIM Survey* respondents do not monitor or audit retention schedule compliance. When asked to estimate the degree (percentage) of retention schedule compliance, 50% of the respondents rated their municipality's retention schedule compliance for paper records at 76-90% and the majority estimated compliance for electronic records at less than 25%.

Deficiencies:

- No auditing of compliance with the City's recordkeeping policies

Compliance with RIM-related Policies: The City does not audit compliance with policies that involve or affect recordkeeping such as the *Clean Desk Policy* or *Video Surveillance Policy*. Consequently, no auditing of the RIM implications of those policies occurs.

Deficiencies:

- No auditing of the RIM implications in RIM-related policies

Desired Future State:

1. **The City will develop, implement, and periodically review measures to audit compliance with the RIM/recordkeeping policies.**

The accountability principle of the *Generally Accepted Recordkeeping Principles®* requires the senior executive with RIM oversight to ensure RIM 'auditability' which is defined as "the process designed to prove the program is accomplishing its goals, while

seeking areas for improvement to further protect the organization and its records.”⁵⁰ The *Principles* further state:

- Employees should be able to demonstrate RIM Program awareness.
- Records should be kept for the right amount of time and disposed of when no longer required.
- Policies should be kept current and cover all records media.
- Auditing should verify the status of complying with these standards.

The compliance principle is described as follows: “The recordkeeping program shall be constructed to comply with applicable laws and other binding authorities, as well as the organization’s policies.”⁵¹ In practical terms, this means the City requires formal processes for monitoring and reporting on RIM compliance. A monitoring/review methodology is required for each RIM policy, procedure, tool, or technology. Development of the compliance monitoring methodologies will be incremental, with a methodology being designed as each RIM policy, procedure, tool, or technology is developed and implemented, thus ensuring compliance monitoring is ‘baked’ into the policy, procedure, tool, or technology.

Compliance auditing will be performed by a combination of resources. Examples of methodologies the City may wish to implement and recommendations for staffing their implementation include:

- Require employees to annually sign off on RIM compliance. This would be done by service area/department managers using a form developed by the Program Manager, Information, Privacy and Elections in consultation with Human Resources.
- Review (spot check) records to ensure *Records Retention Schedule* compliance. This would be done by RIM program staff. Alternatively, Corporate RIM/Privacy Liaison Group members could complete these reviews for their respective areas.
- Review – after a legal hold has been revoked – the manner in which the hold was administered to identify any process deficiencies or lack of compliance with legal hold procedures. Legal would lead this review with input from the affected service areas/departments and the RIM program.
- Review (spot check) the frequency with which a service area/department is contributing electronic records to an official storage repository. RIM program staff would lead this review with assistance from Information Technology Services.
- Review (spot check) inactive paper records to ensure *Records Retention Schedule* and procedural compliance (e.g. correct box labelling, sufficient contents indexing, etc.). RIM program staff would complete this review for

⁵⁰ ARMA International, *Generally Accepted Recordkeeping Principles*® www.ama.org/r2/generally-accepted-br-recordkeeping-principles/accountability

⁵¹ *Ibid.*, www.ama.org/r2/generally-accepted-br-recordkeeping-principles/compliance

centrally stored records and Liaison Group members would complete it for locally stored records (if any).

- Develop a performance monitoring tool or dashboard to be updated quarterly to measure the extent to which each repository is managed [see Appendix 5 for a sample performance monitoring tool]. The tool/dashboard would, among other things, provide IT-generated statistics of the City's electronic storage (e.g. shared network drives, e-mail accounts, etc.). The development and maintenance of the tool/dashboard would be a joint initiative of RIM program and Information Technology Services staff.
- Incorporate RIM compliance in annual performance reviews. This would be done by service area/department managers using criteria developed by the RIM program in consultation with Human Resources.
- Identify instances in which records were unavailable or could not be quickly located during (financial) audits conducted by the City's internal auditor. The auditor would report such instances to the Program Manager, Information, Privacy and Elections.
- Engage an external consultant to review the City's RIM program compliance every 4-5 years⁵².

RIM compliance findings will be reported to the IGC. They may also be reported to Committee/Council (e.g. via the City Clerk's Office annual report or a report from the IGC).

2. The City will develop, implement, and periodically review measures to audit compliance with the RIM aspects of other City policies.

The ability to audit compliance with the RIM aspects of other City policies if/as applicable will first require compliance monitoring specifications to be added to those policies. Compliance monitoring measures will be developed specifically for each policy. For example, spot checks could be conducted to monitor compliance with the *Clean Desk Policy*. Compliance auditing will be performed by a combination of resources and responsibility for compliance monitoring will be specified for each policy. For example, members of the Corporate RIM/Privacy Liaison Group could be responsible for conducting periodic spot checks of *Clean Desk Policy* compliance in their respective areas.

Compliance findings will also be reported to the IGC. They may also be reported to Committee/Council (e.g. via the City Clerk's Office annual report or a report from the IGC).

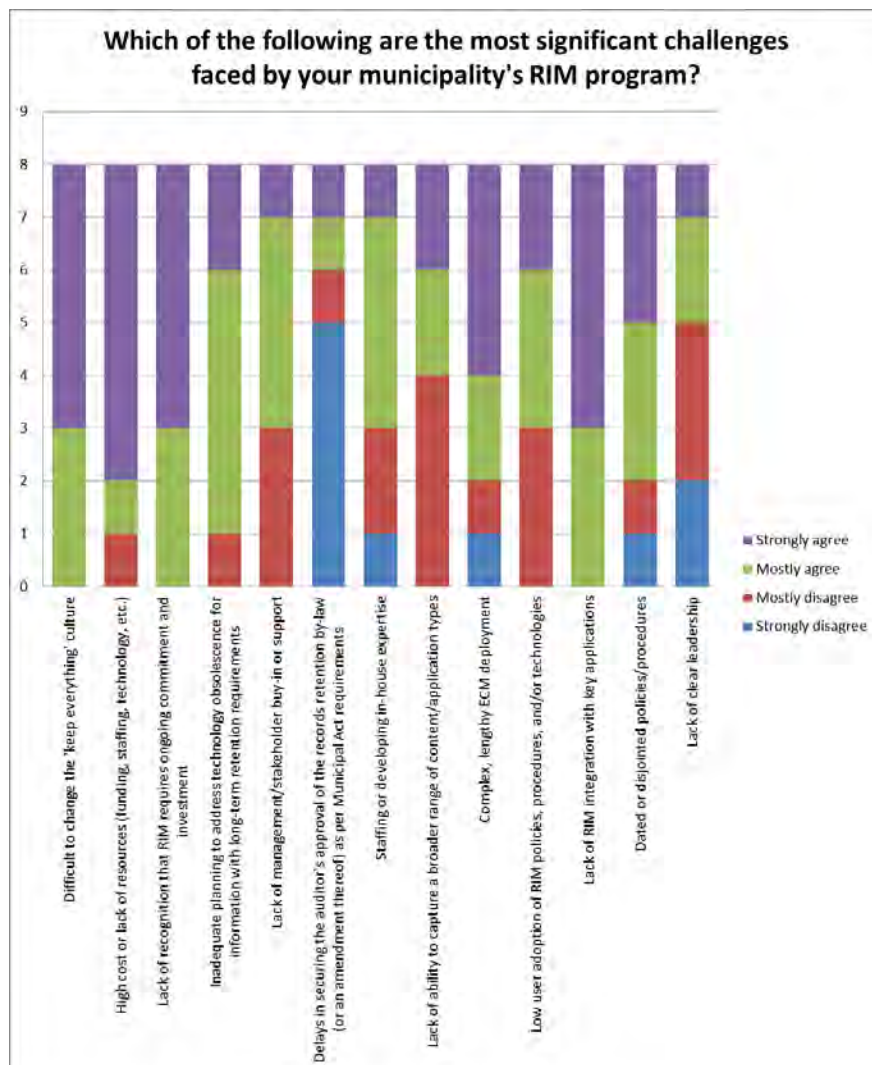
⁵² This formal review would also provide an opportunity to evaluate the City's progress in attaining higher levels of maturity in the five level hierarchy of the *Generally Accepted Recordkeeping Principles*®.

4.2 RIM Processes

One of the objectives of the RIM strategy is to outline key phases and deliverables over a five year period for developing a holistic and integrated lifecycle approach to managing information, including physical paper and electronic records from active to inactive and permanent retention.

As described in this section, the City will need to develop and implement various RIM processes. When considering those processes, it is helpful to examine the RIM challenges faced by other municipalities. Figure 15 illustrates the frequency with which RIM challenges were reported by *Comparator Municipalities RIM Survey* respondents.

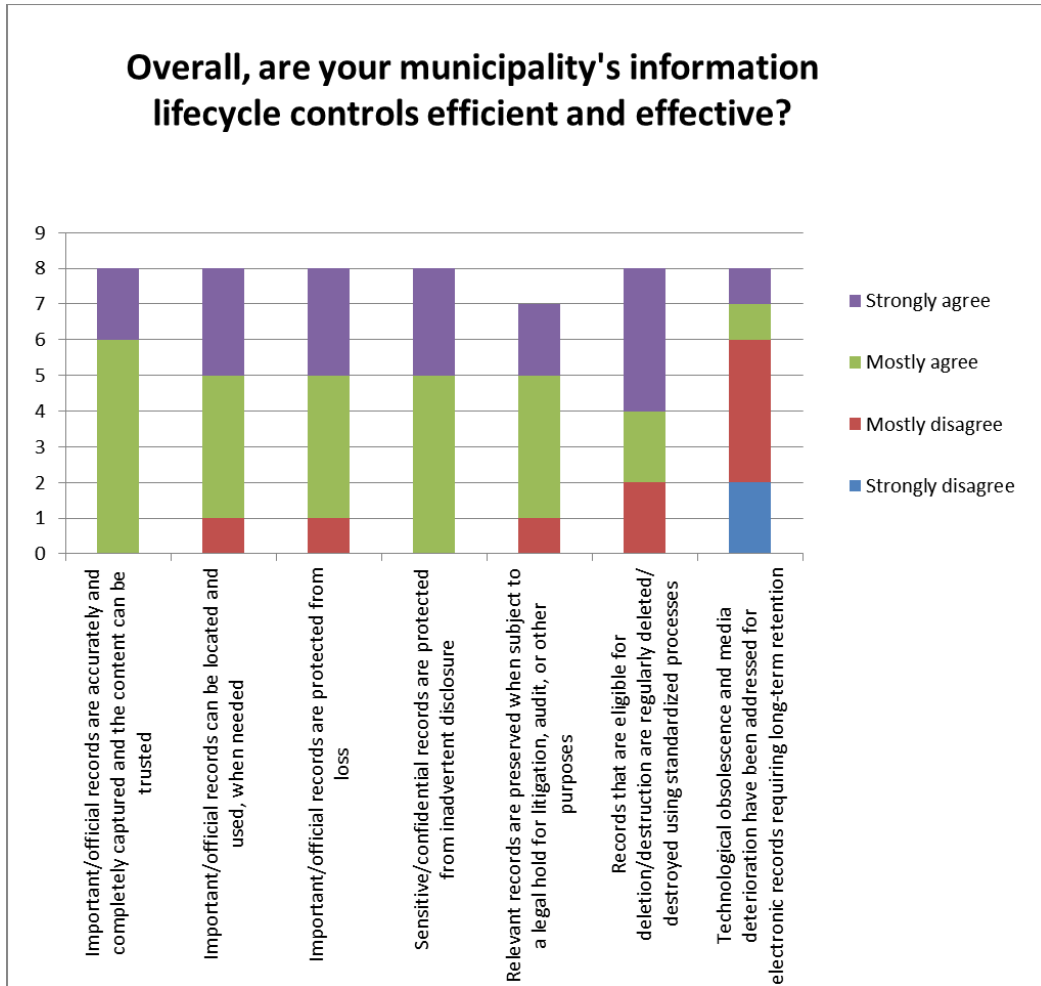
Figure 15 – RIM Challenges at Comparator Municipalities



It is similarly useful to consider the comparator municipalities' responses to the survey question, "Overall, are your municipality's information lifecycle controls effective and efficient?" As shown

in Figure 16, *Comparator Municipalities RIM Survey* respondents rated most of their controls to be effective and efficient. They identified the least amount of effectiveness and efficiency for technological obsolescence and media deterioration.

Figure 16 – Efficiency and Effectiveness of Information Lifecycle Controls at Comparator Municipalities



4.2.1 Information Creation, Capture, and Declaration

This section describes the City's current information creation, capture, and declaration processes and presents a desired future state.

Current State:

Information Creation: One RIM program activity is “determining what records should be created in each business process, and what information needs to be included in the records.”⁵³ While it is likely that various City procedures identify the types of records to be created and the information they are to provide, the City has not conducted a corporate review to ensure it is creating all necessary records or that the records which are being created contain all necessary information. In the absence of such a review, it is also possible that the City is creating some records unnecessarily (e.g. unnecessary duplicates, records for redundant business processes, etc.).

Deficiencies:

- The City may not be creating all necessary records for each business process
- The records the City is creating may not include all necessary information
- The City may be creating records unnecessarily

Information Capture and Declaration: City policy clearly states that “All records generated and received by staff and elected officials of the Municipality in connection with City business are the express property” of the City⁵⁴. The *Responsible Computing Policy* specifically calls out the City's ownership of e-mail messages (and attachments) in the e-mail system.

73% of *Employee RIM Survey* respondents said they understand which records/data they (and their service areas/departments) are responsible for maintaining and retaining as compared to other service areas/departments. There is a similarly high degree of trust that information for which another service area/department is responsible will be available when needed with 70% of respondents saying “I trust that if another service area/department is responsible for maintaining information that it will be available to me when I need it.”

It is interesting to note that when asked to rate the usefulness of different types of RIM assistance that the City may provide in the future, 74% of *Employee RIM Survey* respondents rated assistance in reducing records duplication as either ‘useful’ or ‘very useful’.

Apart from inefficiency (e.g. expending time and storage space to maintain a record in both paper and electronic formats), records duplication often results in confusion regarding the

⁵³ International Organization for Standardization (ISO), *Information and documentation – Records Management – Part 1: General, ISO 15489-1:2001*, s. 7.1.

⁵⁴ City of Guelph, *Records Retention By-law* (By-law # (2104) – 19770).

whereabouts of ‘the record’ of a particular transaction or process, i.e. the complete, authoritative record. That confusion is further compounded when parts of a record for a particular transaction or process are kept in electronic format while other parts are kept in paper format resulting in hybrid recordkeeping. Consequently, the ISO 15489 records management standard recommends that a RIM program decide “in what form and structure records should be created and captured, and the technologies to be used.”⁵⁵ It must be recognized, however, that such decisions should not be made in a vacuum – RIM should consult with service areas/ departments to determine the record forms and structures, and the technologies which will best support each business process and with IT to determine the most appropriate technologies to be used.

Deficiencies:

- Records duplication causes inefficiency and confusion
- Challenges of managing hybrid records

Desired Future State:

- 1. The City will review its business processes to ensure all necessary records are being created, that they contain the necessary information, and that records are not being created unnecessarily.**

As stated in the ISO 15489-1 standard, “Rules for creating and capturing records and metadata about records should be incorporated into the procedures governing all business processes for which there is a requirement for evidence of activity.”⁵⁶

RIM program staff would work with service area/department representatives to develop a methodology for the business process reviews. Managers would form teams to complete the reviews in their respective service areas/departments. RIM program staff would be available as resources to the teams and could provide input as the teams prepare revised procedures for management approval.

⁵⁵ International Organization for Standardization (ISO), *Information and documentation – Records Management – Part 1: General, ISO 15489-1:2001*, s. 7.1.

⁵⁶ *Ibid.*

2. The City will determine in which format records should be captured and implement those decisions.

Before desktop computers, most records were created in paper format by hand or using a typewriter, and filed (often centrally) for future use. Today, most records are created (and usually kept) in electronic formats given the widespread use of desktop and laptop computers, other digital devices (e.g. Smartphones), and new technologies (e.g. websites, social media, etc.). Paper copies of electronically generated records are sometimes made, either for short-term reference or longer retention. Additional duplication occurs if paper documents are kept after they have been scanned to create digital images.

These practices often result in confusion and delays when attempting to identify 'the record of a particular transaction or process. When undertaking a review of the City's business processes (as described above), the format of each type of official record should also be identified and instances where hybrid recordkeeping is unavoidable should be noted. That identification will help ensure that complete and authoritative records can be easily identified and located.

4.2.2 Information Classification, Search, and Retrieval

This section describes the City's current information classification, search, and retrieval environment and presents a desired future state. Areas addressed include:

- Searching for information.
- Quality of information retrieved.
- Central electronic repository.
- Records classification scheme.
- Electronic file naming conventions.

Note: Successfully searching for, retrieving, and accessing information depends heavily on the way in which information is classified. Therefore, this section contains observations from both the 'Information Classification' and 'Information Search, Retrieval, and Access' sections of the *RIM Strategy Current Environment Assessment: Volume 1 – Findings Report*.

Current State:

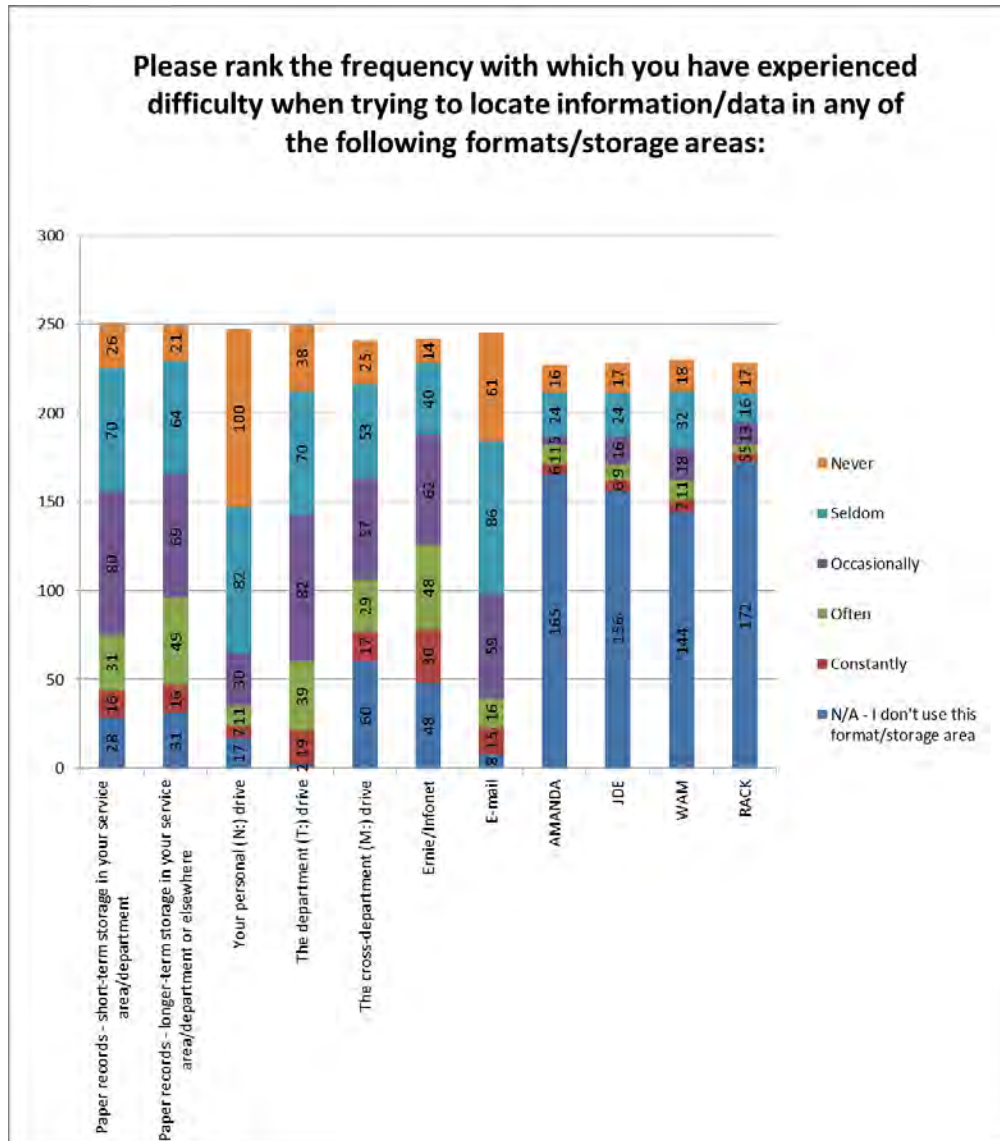
Searching for Information⁵⁷: The *Employee RIM Survey* identified the most common difficulties that employees encounter when trying to locate documents/records/e-mails (in order of frequency):

- A retrieval delay impacted the employee's ability to respond quickly to a request.
- The document/record/e-mail had been destroyed/deleted.
- The employee did not know where to look to find the document/record/e-mail.
- The employee could not locate the most current version of a document/record or the latest e-mail in a threaded conversation.
- A document/record/e-mail was inaccessible due to software version changes, software discontinuation and/or format changes.
- A document/record/e-mail was not in the expected storage location.
- The employee was not authorized to access the document/record/e-mail.

The survey also revealed that employees experience the highest frequency of difficulty (i.e. at least 'occasional' difficulty) when trying to locate information/data in Ernie/Infonet and the department (T:) drive (those two locations tied for first place) followed by paper records in longer-term storage as illustrated in Figure 17.

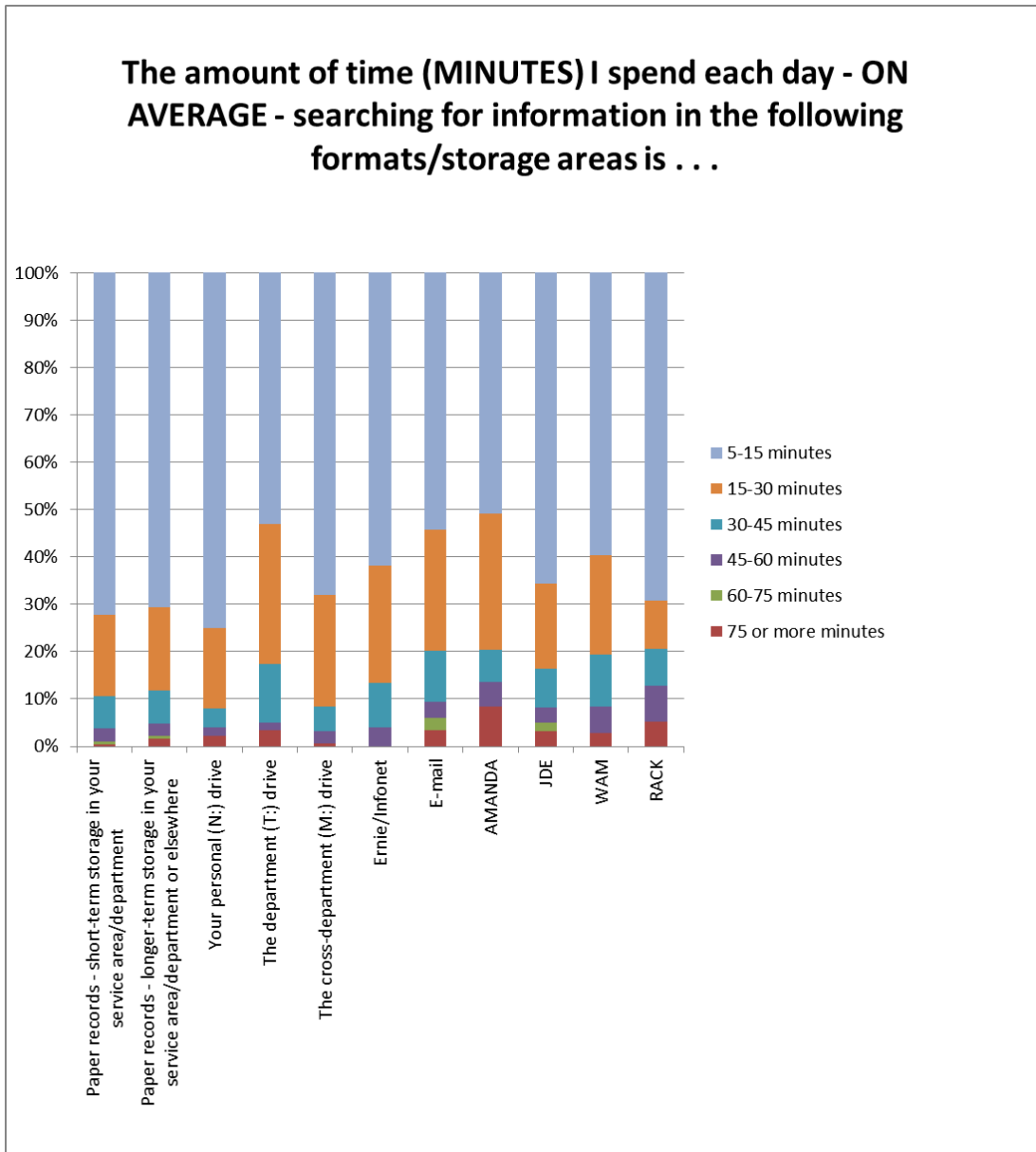
⁵⁷ Few of the *Employee RIM Survey* respondents who use a corporate application (i.e. Amanda, JDE, RAC, or WAM) reported difficulties when trying to locate data/information in such an application. Lack of knowledge on how to search the application was the most commonly reported difficulty.

Figure 17 – Frequency of Difficulty in Locating Information by Format/Storage Location



Most of the surveyed employees spend 5-15 minutes per day (on average) searching for information in each of the formats/storage areas required for their work as shown in Figure 18. It is interesting to note that e-mail and the department (T:) drives which are used by the greatest number of employees are also the two record formats/storage locations which have the greatest search times.

Figure 18 – Time Spent Searching for Information



Participants at the senior management focus group stated that the public and other stakeholders expect the City to know where its data/documents/records/information are and be able to quickly find the correct/final/authoritative record when needed. Failing to do so can result in embarrassment, loss of confidence in municipal government (and its employees), and reputational risk. Further, it can result in legal risks, particularly when responding to *MFIPPA* and discovery requests. They, and some of the other stakeholders interviewed, expressed concern that retrieval challenges prevent the City from saying definitively that it has found all relevant data/documents/records/information. Concern was also expressed that legal risks inherent in not being able to (quickly) find data/documents/records/information could result in

the City deciding to settle a claim rather than risk losing at trial despite being confident that a claim has no merit.

Deficiencies:

- Employees experience greatest difficulty when attempting to retrieve information in e-mail, Ernie/Infonet, or a department (T:) drive
- Failure to quickly find information (particularly the correct/final/authoritative record) can result in embarrassment, loss of confidence in municipal government/its employees, and reputational risk
- The City may be unable to say definitively that it has found all relevant data/documents/records/information in response to *MFIPPA*, discovery, and other requests
- City employees spend a significant amount of time (500 to 1,500 hours per week at minimum) searching for information

Quality of Information Retrieved: 54% of *Employee RIM Survey* respondents are not confident that the information (documents or data) that they use in their work is correct, current, and up-to-date.

Deficiencies:

- Many employees are not confident that the information (documents or data) that they use in their work is correct, current, and up-to-date

Central Electronic Repository: While 75% of *Employee RIM Survey* respondents said they have access to the information sources that they regularly need to make decisions in their work, two-thirds believe the City needs a central electronic repository in which to store documents/records of interest, use, and/or benefit to all employees. Almost all of those respondents would like to see policies, procedures and processes, and forms kept in a central repository followed closely by management and/or Council-related meeting timelines, and agendas and minutes. Employees also identified additional document/record types that they would like to see stored in a central electronic repository, with the most commonly cited additional types being by-laws, agreements, and various types of plans (e.g. registered plans, official plans, etc.).

Deficiencies:

- The City does not have a central electronic repository in which to store documents/records of interest, use, and/or benefit to all employees

Record Classification Scheme: A 'records classification scheme' is a hierarchical tool for classifying, naming/titling, accessing, and retrieving records. Many municipalities – and 75% of *Comparator Municipalities RIM Survey* respondents – have a corporate classification scheme.

Although the City's *EDMS Project Charter* assumed the implementation of a corporate records classification scheme to support the EDMS roll-out, a classification scheme was not developed. Consequently, records classification at the City is not standardized and many diverse, *ad hoc*, and informal structures are used. The *Employee RIM Survey* revealed that many service areas/departments have developed structures for organizing records and that those structures are being used as shown in Figure 19 below.

Figure 19 – Existence and Use of Service Area/Department Classification Structures

Record Type/Location	Classification Structure Exists	Classification Structure is Used
Shared department (T:) drive	86%	78%
Personal (N:) drive	53%	43%
Paper records	77%	69%

It is interesting to note, however, that only 40% of the respondents agree that the structure developed by their service area/department meets their needs for organizing records.

The survey also revealed:

- Only 22% of service areas/departments use the same structure to organize paper and electronic records so many employees must learn and use more than one system.
- 74% of respondents would find assistance in improving the way in which records are organized or data is retrieved either 'useful' or 'very useful'.

Deficiencies:

- Diverse, *ad hoc*, and informal records classification structures
- Many of the records classification structures do not meet employees' needs
- Duplicated efforts to create, use, and maintain multiple structures across the City
- Most service areas/departments organize paper and electronic records differently

Electronic File Naming Conventions: A file name is the chief identifier of an electronic record, providing information that places it in context with other records. A file naming convention identifies the elements to be used in a file name (e.g. title, author, etc.) and the order of those elements. A file naming convention can also be used to identify and track versions and to differentiate between draft and final/approved/published documents. 50% of *Employee RIM*

Survey respondents said their service area/department identifies records or data by version (e.g. Version 1, 2, etc., or draft vs. final).

The *Records and Information Management Best Practices* available on the City Clerk's Office Intranet recommend naming a file by the function or activity to which it relates and provide a suggested version control protocol. As shown by the findings below from the *Employee RIM Survey*, employees are either unaware of that guidance or wish to receive more specific guidance in naming electronic files:

- 76% rated guidance in the consistent naming of electronic documents/records as 'useful' or 'very useful'.
- 64% similarly rated assistance in implementing mechanisms to track versions of documents.

Deficiencies:

- *Ad hoc*, unpredictable electronic file names compromise search and retrieval
- Lack of version control standardization may cause confusion and retrieval delays
- Potential negative outcomes if an incorrect version is used in decision-making, released publicly, submitted as evidence in court, or released under *MFIPPA*

Desired Future State:

Note: Ernie/Infonet improvements and the feasibility of a central electronic repository should be considered as part of the City's EDMS planning (see Section 4.4).

1. The City will review and assess information retrieval in Ernie/Infonet and implement improvements.

A review and assessment is required to determine why employees experience retrieval challenges when attempting to locate information in Ernie/Infonet. The review and assessment would examine such topics as the type of information provided and how it is organized, the application's search functionality, and the ease with which searches can be performed. Necessary improvements would be identified.

Note: This review should be completed in parallel with an investigation of the feasibility of creating a central electronic repository, as discussed below.

2. The City will assess the feasibility of creating a central electronic repository to store documents/records of interest, use, and/or benefit to all employees and implement the repository if feasible.

Many employees require access to certain types of records (e.g. policies, forms, etc.). This assessment would determine the feasibility of creating a central electronic repository to store documents/records of interest, use, and/or benefit to all employees.

3. The City will develop and implement a function-based records classification scheme.

Standardized records classification would provide many benefits such as:

- Reducing the time spent to retrieve information, particularly in response to *MFIPPA* requests or requests in the event of litigation, investigation, or audit.
- Promoting information sharing.
- Providing the basis for implementing an information security classification and a more granular records retention schedule.

Function-based records classification (as opposed to other types such as subject classifications) is endorsed by the ISO 15489-1 records management standard as a means to more readily respond to accountability obligations, and efficiently and effectively manage records. It is also the preferred classification approach of the Canadian federal government, many provincial governments (including Ontario), and many private sector organizations. It is also the preferred approach of many municipalities that do not use *The Ontario Municipal Records Management System (TOMRMS)*⁵⁸, a subject-based classification scheme in which records are grouped in large categories.

A function-based records classification scheme would organize records into categories based on the City's functions and activities, not the service area/department where the records were created or maintained. It would also provide a way to identify the service area/department which is responsible⁵⁹ for each group/series of records, thus allowing a retention period to be set for the official record holder and giving all others the authority

⁵⁸ The City modified *TOMRMS* to provide a high-level structure for grouping or categorizing records for retention scheduling purposes (records are listed in the *Records Retention By-law* under City-modified *TOMRMS* classification categories). The City Clerk's Office does not promote the City's modification of *TOMRMS* as a corporate records classification scheme, although a few service areas/departments have experimented with using it to organize paper records and/or electronic files in shared network directories.

⁵⁹ The Office of Primary Interest (OPI) or Responsible Business Unit (RBU) would identify the department/functional area responsible and accountable for the documentation of a function or activity, and for authorizing the disposition of the official records of the function or activity.

for the earlier disposition of their copies of those records. The many benefits of a function-based classification scheme include:

- Directly linking records with the City's functions and activities.
- Eliminating the siloed view of information and the dispersal of identical (or related) records across different categories/headings as is now the case when records are classified by service area/department.
- Being suitable for organizing both paper and electronic records, resulting in one system for employees to learn and use.
- Being capable of adapting easily to future changes in business operations and organization.

The records classification scheme would be based on a top down view of the City's operations and services as identified from reviewing City documentation (e.g. policies, organization charts, etc.) and validated by service area/department representatives. That view would identify the core functions representing the City's primary activities (e.g. Council administration, by-law enforcement, recreation programming, etc.) and the functions which support those activities (e.g. finance, human resources, etc.). The activities and functions would also be validated by service area/department representatives. Records would be organized using a set pattern of divisions in a hierarchical (or tiered) structure from the general to the specific and by function. The classification scheme would also specify the best way to organize each type of information (e.g. by date, then subject). Consultation with service area/department representatives would ensure the accurate classification of records and their optimum organization/arrangement.

The RIM Specialist would develop the classification scheme in consultation with service area/department representatives who would also validate the draft scheme to ensure a logical, consistent, easy to use, and unambiguous structure (i.e. it should be possible to classify a record in only one part of the classification scheme). A process would also be implemented for requesting, approving, and implementing revisions to the records classification scheme to ensure its integrity over time.

4. The City will develop and implement conventions for naming electronic files.

Naming conventions are required – particularly in shared electronic repositories such as the department (T:) drive – to create consistent, predictable, descriptive, and understandable file names, and identify and track versions⁶⁰ if/as applicable. The development and implementation of file naming conventions will improve retrieval speed and accuracy, and facilitate the disposition of versions which are no longer required. Specifically, the file naming conventions will:

⁶⁰ This protocol is not required for files in Microsoft SharePoint or an Enterprise Content Management (ECM) system because those systems provide automated version control as long as a user uploads a revised file of the same name.

- Help employees to easily identify the file(s) they are looking for.
- Enable employees to browse file names more effectively and efficiently.
- Help employees distinguish one electronic file from others on the same (or a similar) topic.
- Make file naming easier because an employee who follows the conventions will not have to 're-think' the naming process each time.
- Allow sorting of documents in a logical sequence (e.g. by date).
- Eliminate the confusion and delays often experienced when attempting to distinguish between different versions of a draft document or between drafts and final/approved/published documents.

The use of file naming conventions along with a records classification scheme would bring greater precision to the organization of electronic records, particularly in the near-future until the City implements an enterprise content management (ECM) system (or similar technology) which can automate versioning and eliminate the need to code a 'record type' in a file name because it can be captured instead via a drop down list during the file saving process.

Corporate standards would be developed in consultation with service area/department representatives to govern file name elements (e.g. an approved list of record types such as letter, report, etc.) and the version control protocol (particularly the prescription of the date format to be used, such as YYYY-MM-DD). The consultation would also determine whether additional elements (e.g. keywords) will be captured as metadata elements where feasible⁶¹.

⁶¹ In Microsoft Word, metadata elements can be captured in the 'Properties' of a file (found under 'File' in the main tool bar).

4.2.3 Information Sharing and Collaboration

This section describes the City's current practices for information distribution, sharing, collaboration, and workflow and a desired future state.

Current State:

Electronic Collaboration: According to the City's *Records and Information Management Best Practices*, the T: drive (department drive) is intended for collaboration within a department while the M: drive is intended for collaborative cross-departmental records (e.g. cross-department or service area initiatives). 25% of *Employee RIM Survey* respondents do not use the M: drive (the cross-department drive).

The *Records and Information Management Best Practices* also discuss the use of central folders for projects and collaboration on documents. As stated earlier, it is not known how many employees are aware of or follow these best practices published by the City Clerk's Office. 67% of the survey respondents rated an improved ability to collaborate on a document with other employees as either 'useful' or 'very useful'.

It is likely that the City, like other organizations, will expand its methods of electronic collaboration in the future. Indeed, the City's *Corporate Technology Strategic Plan* recommends the City embrace "new consumer technologies, implementing secure, enterprise equivalent solutions where appropriate."⁶² One such recommended technology is online collaboration spaces for shared document editing, project and task management, and tracking. Another is to simplify large file sharing and distribution.

Information Technology Services is undertaking a study on upgrading the Intranet (Ernie/Infonet) so it can be used in the future for file sharing and collaboration, and potentially provide internal social media functionality. The objective would be to move away from network file shares and also encourage employees to provide links to documents instead of distributing them through the e-mail system.

Deficiencies:

- Limited use of the M: drive may indicate that cross-departmental collaboration is performed elsewhere (e.g. by circulating draft documents for feedback via e-mail)
- Interest in improving the ability to collaborate on documents with other employees

⁶² Prior & Prior Associates Ltd., *City of Guelph Corporate Technology Strategic Plan, Final Report Volume 1* [August 2012].

Desired Future State:

1. The City will promote use of its existing electronic collaboration resources.

Greater promotion of these resources (particularly the M: drive) will hopefully result in their increased use, thus facilitating document collaboration. Greater use of these resources may help reduce the volume of documents which are circulated internally via e-mail for review and comment.

2. The City will explore the feasibility of introducing enhanced collaboration spaces and implement those spaces if feasible.

This study will assess the feasibility of introducing online collaboration spaces for such activities as shared document editing, project and task management, and document tracking. The study will identify the collaboration functionalities most beneficial for the City and recommend (a) preferred system(s).

Enhanced collaboration spaces would provide many benefits, for example:

- Allow employees who do not work in the same service area/department or at the same location to work together in creating or revising a document (e.g. a report).
- Provide an attractive alternative to securing input electronically at a time that is convenient to each participant instead of attempting to schedule in-person meetings.
- Provide a central, easily accessible repository for the documents pertaining to a project, thus allowing project participants to share one authoritative source of information, be kept informed, and remain engaged in the project.
- Improved version control because updates to a document will be seen immediately and stakeholders will know at all times where to find the latest version of a document.
- Eliminate the use e-mail as the primary means of communicating with document collaborators or project team members, thus reducing the volume of e-mail messages that are sent and stored.
- Automatically notify reviewers (or approvers) that a new/revised document has been uploaded, allowing them to review the document, make any necessary changes, and notify other stakeholders that the document is ready to move to the next step in the process.

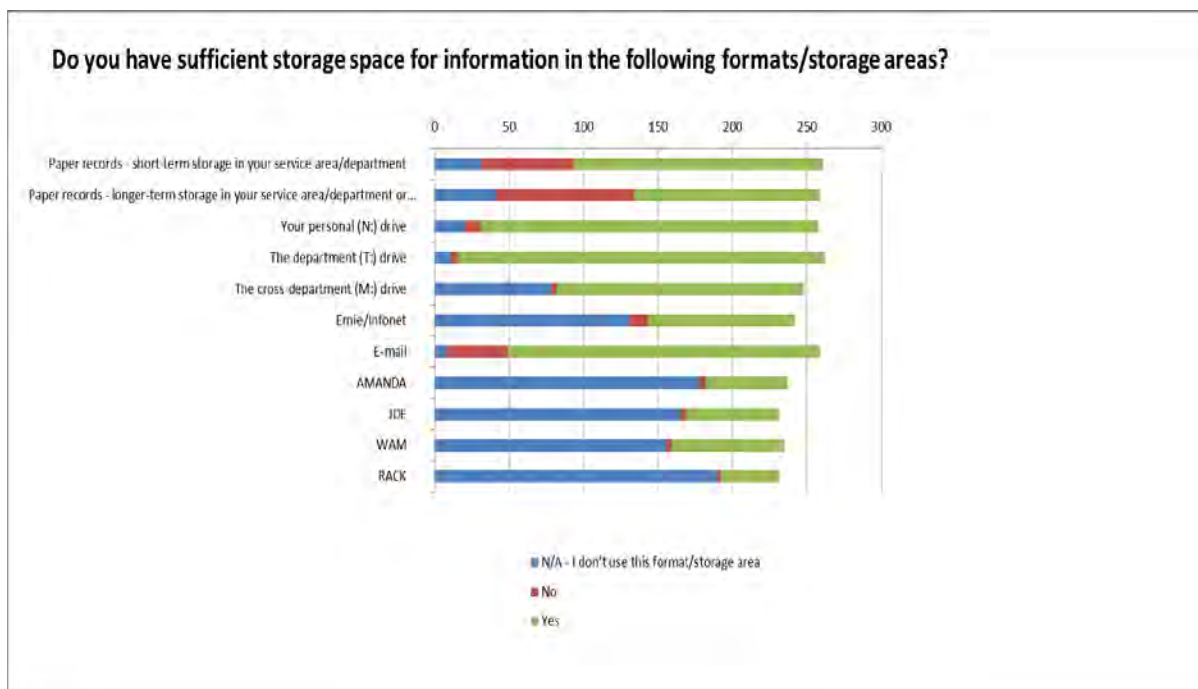
4.2.4 Information Storage

This section describes the City’s current information storage practices and a desired future state.

Current State:

Paper Records Storage: Active paper records (i.e. records that are used frequently) are kept in service areas/departments at City Hall and other City facilities. Because each service area/department is responsible for storing its active records, the volume of those records and the frequency with which they are retrieved are not known. As shown in Figure 20 below, space in service areas/departments (or elsewhere) for the longer-term storage of paper records followed by space in service areas/departments for the short-term storage of paper records were the only record formats/storage areas for which *Employee RIM Survey* respondents indicated a shortage of any significance.

Figure 20 – Sufficiency of Information Storage Space



Inactive paper records (i.e. records that are not used frequently but which must be kept to satisfy legal and other requirements as per the *Records Retention By-law*) are stored in boxes in the City Hall basement. Responsibility for managing that storage area is not assigned to one service area/department; instead, various service areas/departments have been allocated space which they administer as they see fit (e.g. perform retrievals if/when required, identify records eligible for disposition according to the *Records Retention By-law*, etc.). Inactive paper records are also stored at some satellite sites (e.g. Water Services has a dedicated area for storing inactive records).

Because each service area/department is responsible for storing the inactive records it creates/ receives and maintains, the volume of those records is also unknown. Similarly, the frequency with which stored records are retrieved from any storage location is not known. The City has not developed procedures/standards for box labelling or indexing; however, service areas/ departments (e.g. Water Services) may have developed local procedures/standards.

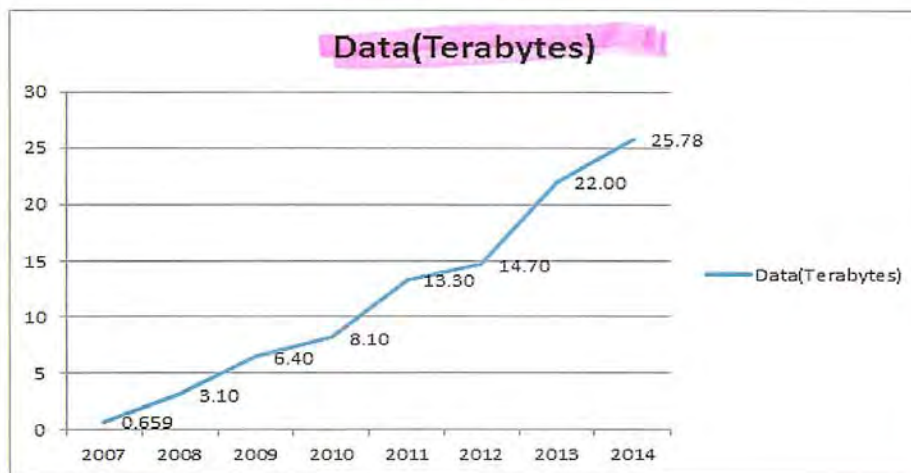
Access to the storage area in the City Hall basement is programmed on an employee's access pass upon a manager's request. Because space in the storage area is not segregated/divided (it is one large space which many service areas/departments share), an employee who is authorized to enter the area can potentially access any of the stored records.

Deficiencies:

- Lack of standardization and internal security in managing inactive paper records
- Paper records storage constraints in service areas/departments or elsewhere

Electronic Records Storage: As shown in Figure 21, the City's network data storage growth continues to increase⁶³ with Information Technology Services reporting a 50% increase in raw network data growth in 2013⁶⁴.

Figure 21 – Network Data Growth



According to the draft *Electronic Data Retention Policy*, “the City is currently facing a data management crisis caused by the absence of a data retention policy. Growth of file-share data, email databases, and the backup tapes required for restoration needs to be addressed

⁶³ Information Technology Services, *Information Technology 2012 Annual Report* [undated].

⁶⁴ *Ibid.*

immediately.”⁶⁵ The draft policy proposes to limit electronic storage space (both e-mail mailbox and file share storage) to “prevent oversubscribing disk capacity”⁶⁶ and retain data on the e-mail and file servers as shown in Figure 22 below⁶⁷ on the understanding that employees would save electronic data which is an ‘official record’⁶⁸ in an EDMS (electronic document management system) or special file share folders, or print them and then classify, retain, and dispose of the resulting paper records as per the *Records Retention By-law*.

Figure 22 – Interim Data Storage Solution

Storage Location	Data Type	Proposed Storage Method/ Retention Period
File Server	Files accessed ⁶⁹ within the last 5 years	Highly available ⁷⁰
	Files accessed within the last 5-7 years	Replaced by a stub (grayed out icon) and available when clicked, but at a slower retrieval rate ⁷¹
	Files not accessed within the last 7 years	Permanently deleted
E-mail Server	E-mails and attachments accessed within the last 5 years	Highly available ⁷²
	E-mails and attachments accessed within the last 5-7 years	Replaced by a stub (grayed out icon) and available when clicked, but at a slower retrieval rate
	E-mails and attachments not accessed within the last 7 years	Permanently deleted

As of the writing of the RIM Strategy, the ‘special file share folders’ referenced in the draft policy have not been set up and the City’s EDMS is used only by a handful of employees in two service areas/departments.

In the absence of organization-wide RIM policies, procedures, tools and training, employees are not currently equipped to know which electronic records should be kept on the EDMS, which can be deleted, etc. This will lead to inconsistent *ad hoc* practices as employees decide for themselves what to delete in order to meet storage limitations, creating a situation where important records may be inadvertently destroyed.

⁶⁵ City of Guelph – Information Technology Services, *Electronic Data Retention Policy*, executive summary [draft, February 20, 2015].

⁶⁶ City of Guelph – Information Technology Services, *Electronic Data Retention Policy*, s. 4.4 [draft, February 20, 2015].

⁶⁷ The draft policy states that data subject to a legal hold will not be deleted until the hold has been removed to meet legal needs and as per RIM best practices

⁶⁸ In the definitions section of the draft policy, an ‘official record’ is defined as a record “generated or received in connection with the transaction of City business, and preserved for a period of time as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the City.”

⁶⁹ According to section 5.1 of the City of Guelph – Information Technology, *Electronic Data Retention Policy*, definitions [draft, February 20, 2015], ‘access’ will be calculated based on the last modified date.

⁷⁰ City of Guelph – Information Technology, *Electronic Data Retention Policy*, definitions [draft, February 20, 2015] defines ‘active data’ as “data stored on high-speed disk or in active databases that has been accessed within the last five years.”

⁷¹ According to s. 5.2 of the City of Guelph – Information Technology, *Electronic Data Retention Policy*, definitions [draft, February 20, 2015], this storage will be “a second tier storage (slower disk)”.

⁷² *Ibid.*

The absence of viable alternatives to network storage will result in the indiscriminate deletion of electronic records, thus compromising the City's ability to secure a high rate of *Records Retention By-law* compliance. It may also result in employees transferring electronic records to less secure storage (e.g. USBs, CDs, etc.) to circumvent e-mail box or file share storage quotas/limits.

Deficiencies:

- Network data volume continues to grow
- The EDMS (without needed RIM policies, procedures and training) may not be a viable alternative to file server storage
- Inefficient and time-consuming process to print and file paper copies of electronic records

Electronic Records Storage with Third Parties: Not all of the structured systems used to conduct City business are managed on the City's servers. Some applications are hosted by third parties (e.g. Economic Development uses the cloud-based Salesforce.com application). Other applications use cloud storage, i.e. websites, a few web applications (not specified), and SasS applications (e.g. Eclipse for storing project management data). The City's social media content in applications such as Facebook and YouTube also resides on third party servers. The City's business continuity plan (BCP) project will use Office 365 for document management⁷³.

Deficiencies:

- Service level agreements with third parties (e.g. Salesforce.com, Facebook, YouTube, etc.) may not provide adequate management of the City's electronic records

Desired Future State:

- 1. The City will investigate, recommend, and implement the location(s) in which inactive paper records will be stored in the future.**

Ensuring that "records are maintained in a safe and secure environment" is a RIM program responsibility⁷⁴. This investigation would recommend the optimum future storage location(s) for the City's inactive paper records taking into consideration factors such as current volume, anticipated annual growth volume, and anticipated retrieval frequency. The investigation would assess the feasibility and cost (both initial/set-up and

⁷³ E-mail from the Corporate Database Administrator via the Records and Information Specialist [March 10, 2015].

⁷⁴ International Organization for Standardization (ISO), *Information and documentation – Records Management – Part 1: General, ISO 15489-1:2001*, s. 7.1.

ongoing costs) of each of the inactive records management methods commonly used by municipalities:

- a) Establish and staff a City record centre (i.e. on-premise storage).
- b) Outsource the storage to a commercial record centre.
- c) Implement a hybrid option whereby selected inactive records are kept in a City record centre while others are stored at a commercial record centre (e.g. inactive records with higher anticipated retrieval frequency are kept on-site).

It is anticipated that this investigation will result in the secure and standardized storage of inactive records.

2. The City will provide the necessary infrastructure (policy/procedures, technology, and training) before implementing any e-mail mailbox or file share storage quotas/limits.

It is recommended that the City clearly communicate its policy requirements for e-mail retention (as provided by the *Records Retention By-law* which governs the retention of all City records regardless of format or storage location) and develop procedures on effectively managing e-mail, including use of the 'archive' function in Microsoft Outlook. Training would also be provided. In addition, if employees will be expected to save e-mail messages to another electronic repository (i.e. an EDMS or special file share folders), the City will need to implement that storage.

Without providing this crucial infrastructure prior to implementing a quota/limit on e-mail mailbox or file share storage, the City will be at significant risk of employees indiscriminately deleting electronic records to meet the quota/limit (e.g. an employee would arbitrarily delete e-mails with large attachments from his/her e-mail account to quickly free up space, allowing the employee to continue sending and receiving messages).

Note: We do not recommend asking employees to move e-mails from Microsoft Outlook to special file share folders because that movement will break the audit trail, thus exposing the City to challenges regarding the integrity and authenticity of those messages and any attachments. Also, the viability of asking employees move e-mails to the current EDMS is questionable given that only a handful of employees have been trained to use selected functions in that system. Further, the printing of e-mails so they can be classified, retained, and disposed of in paper/hard copy will increase the volume of paper records requiring storage and eliminate the ease/speed of sharing that information in the future because it will no longer be in electronic format. Consequently, the City may wish to defer the setting of any quotas/limits until such time as all employees have access to an ECM system (see Section 4.4) and instead focus on reducing electronic storage volume through rigorous application of the *Records Retention By-law*. Volume reductions coupled with shorter retention periods for back-up tapes (see Section 4.2.5) will help reduce the cost to run and store network back-ups and also reduce restoration time in the event of a disaster.

3. The City will assess the adequacy of the RIM and privacy protection provisions in cloud applications and renegotiate those provisions to ensure the implementation of best practices if/where applicable.

While City-generated data/information/records in third party cloud applications (e.g. salesforce.com, Facebook, etc.) are not in the City's custody or control, they remain the City's responsibility. Consequently, they should be managed to meet the same legislated and policy requirements as data/information/records in the City's custody or control. Ann Cavoukian, Ontario's prior Information and Privacy Commissioner, recently stated: "the critical question for institutions which have outsourced their operations across provincial and international borders is whether they have taken reasonable steps to protect the privacy and security of the records in their custody and control. I have always taken the position that you can outsource services, but you cannot outsource accountability."⁷⁵ Consequently, the City should assess the adequacy of the RIM provisions in its service level agreements with such parties and renegotiate those provisions to ensure the implementation of RIM best practices if/where applicable.

4. The City will plan and implement paper and electronic records clean-up projects.

These clean-ups would improve the organization/classification of records and eliminate a sizeable volume of valueless information or 'ROT' (redundant, obsolete, or transitory information), thus reducing search time and helping to alleviate records storage space constraints. The clean-ups would also support the City in achieving a higher rate of *Records Retention By-law* compliance. Apart from these immediate efficiency and risk mitigation benefits, the electronic records clean-ups would also reduce the amount of time required to run (or restore) back-ups and support the future implementation of an ECM system (or similar technology) by introducing order and standardization.

⁷⁵ Office of the Information and Privacy Commissioner (Ontario), Privacy Investigation Report PC12-39, *Reviewing the Licensing Automation System of the Ministry of Natural Resources* [June 27, 2012] https://www.ipc.on.ca/images/Findings/2012-06-28-MNR_report.pdf

4.2.5 Information Privacy, Security, and Protection from Disaster

This section describes the City's current information privacy, security, and disaster protection practices and a desired future state.

Note: See Section 4.2.4 for security concerns pertaining to inactive records storage.

Current State:

Information Security: "An information security classification . . . assists in determining the value and sensitivity of information as well as the protective measures to be applied."⁷⁶

Information security classifications typically specify different levels of information security (e.g. confidential vs. public), with one level being assigned to each document/record. While the City has not developed such a classification, several City documents provide guidance in keeping information secure:

- The draft *Privacy Policy* describes the requirements for protecting personal information.
- The *Responsible Computing Policy* instructs employees to not use e-mail for confidential or sensitive messages given the risk of misdirection or redirection.
- The *Clean Desk Policy* specifies practices for keeping paper and electronic records secure to prevent unauthorized access.
- The *Records and Information Management Best Practices* discuss the secure storage of documents containing personal information.

Deficiencies:

- The City does not have an information security classification

Secure Information Destruction: The *Records Retention By-law* requires records that have satisfied their retention obligations and drafts, copies, or other transitory records to be "destroyed in a way that preserves the privacy and confidentiality of any information they contain."⁷⁷

The City has contracted with a NAID-certified⁷⁸ commercial shredding service to shred paper, electronic media (e.g. data tapes, DVDs, CDs, etc.), and clothing. Seventeen shredding

⁷⁶ Office of the Chief Information Officer (British Columbia), *Information Security Classification Framework* http://www.cio.gov.bc.ca/cio/informationsecurity/classification/information_security_classification_framework.page

⁷⁷ City of Guelph, *Records Retention By-law* (By-law # (2014) – 19770), s. 5.1g.

⁷⁸ NAID is the National Association for Information Destruction. According to the NAID Canada website <http://www.naidonline.org/ncan/en/cert/history-purpose.html>, "The NAID AAA Certification Program is a voluntary program for NAID member companies providing information destruction services. Through the program, NAID members will be audited for mobile and/or plant-based operations in paper or printed media, micromedia, computer hard drive destruction, and/or computer hard drive sanitization. Under this program, the certification application and

disposal consoles are provided at City Hall for the secure destruction of small volumes of paper records as per the by-law plus confidential waste papers (e.g. botched photocopies of documents containing personal information). Shredding consoles are also provided at satellite sites (e.g. Courts) upon request. There is no audit mechanism to ensure the consoles' proper use and the volume of records shredded (four week cycle) is not known.

The City Clerk's Office co-ordinates an annual pickup of paper records to be shredded as per the by-law and service areas/departments may schedule *ad hoc* pickups at their own cost during the year based on need. Corporate Building pays for the annual shred and the shredding console service.

Deficiencies:

- Shredding disposal consoles are not available at all City locations and the availability of alternative shredding capabilities at those locations is not known
- Responsibility is split for co-ordinating and funding the shredding of paper records

Vital Records: The *Records Retention By-law* defines 'vital records' as "records that are essential to the continuation or resumption of City business in the event of a disaster. They allow the organization to continue to fulfill its obligation to the taxpayers, employees, other levels of government, and outside interested parties." The City has not identified its vital records or planned for their protection; however, by default, all electronic data/information/records on the City network are considered vital because they are backed up for disaster recovery purposes.

By-laws, particularly by-laws that are still in force, are commonly considered to be vital records (and all by-laws are commonly considered to be archival records). The City Clerk's Office loans original by-laws of ten or more pages⁷⁹ to City employees upon request and for a maximum of ten business days unless a business case is made for a longer borrowing period. Although loaned by-laws are tracked and the City Clerk's Office follows up on by-laws which are not returned by the due date, this loan program exposes by-laws to the risk of damage/loss.

Deficiencies:

- Vital records are not identified or protected
- Original by-laws are exposed to the risk of damage/loss when loaned to staff

associated fees cover only individual locations. If a NAID member operates in multiple locations, each location must pass the audit to be certified."

⁷⁹ For any by-law shorter than ten pages, the City Clerk's Office will scan and provide an electronic copy of a requested by-law. A copy of the scanned by-law is also stored in the M: drive.

Network Back-up and Recovery: Information Technology Services is responsible for network data back-up and recovery, spending almost \$80,000 + HST (on average) per year to run back-ups and store back-up tapes off-site. Information Technology Services has proposed a new process for managing back-ups whereby daily back-ups (incremental back-ups of critical systems which cannot withstand more than one day of manual restoration) and weekly back-ups (complete back-ups to be used for business continuance or disaster recovery only) would be kept indefinitely. Any existing back-ups which cannot be restored by the City's current data centre hardware or which are older than ten years would be catalogued and then destroyed.

Deficiencies:

- Indefinite retention of daily and weekly back-ups will result in some records/information being kept longer than allowed by the *Records Retention By-law*

Disaster Plan: Information Technology Services is leading the development of the City's disaster plan. To date, high-level information (e.g. the organizations/individuals on whom the City depends to be able to perform an essential service) has been gathered for the City Clerk's Office with a placeholder for each of Corporate Communications and Information Technology Services. No data has been gathered regarding the data/documents/records that would be required to perform each of the essential services identified to date.

Deficiencies:

- Disaster plan includes placeholders only for City Clerk's Office, Corporate Communications, and Information Technology Services
- Data/documents/records used to perform essential services are not identified

Desired Future State:

1. The City will develop and implement an information security classification.

An information security classification is recommended to prevent the unauthorized disclosure, use, or loss of records by assigning each record group/series to a security classification in keeping with the records' value and sensitivity. There are many possible information security classification models, with most having three or four distinct categories. For example, the Government of Alberta's model uses the following four categories: public, protected, confidential, and restricted.

2. The City will review and provide secure information destruction at all City facilities.

Employees at every facility need to securely destroy small volumes of paper records as per the *Records Retention By-law* plus confidential waste papers (e.g. botched photocopies of documents containing personal information). It is recommended that the City review the shredding capabilities at each facility and ensure that a shredding disposal console or alternative (e.g. a shredder) suitable for the efficient destruction of the regular volume of paper records is available at every City facility to provide secure and cost-efficient information destruction when/as required.

3. The City will transfer funding for the shredding of paper records to the City Clerk's Office.

As described above, Corporate Building pays for the annual shred which the City Clerk's Office co-ordinates and service areas/departments both pay for and co-ordinate any *ad hoc* pickups they require during the year. Because paper records shredding is a RIM program service, the funds now expended by Corporate Building and individual service areas/departments on shredding services should be reallocated to the City Clerk's Office. Being responsible for both the funding and co-ordination of paper records shredding will also allow the City Clerk's Office to benefit from any economies (e.g. consolidating *ad hoc* pickups through the year).

Note: The City currently contracts with one vendor for the shredding of paper records (both the annual and *ad hoc* pickups) and for the shredding console service. Therefore, the adoption of this recommendation would also transfer responsibility for the shredding console service to the City Clerk's Office.

4. The City will develop and implement a vital records program.

Because the informational value of vital records is so great and the consequences of their loss, damage or inaccessibility so severe, special protection is justified. Consequently, vital records must be identified and appropriately protected to ensure their availability to resume operations during and after a disaster, enable the City to continue complying with legislated obligations, and ensure accountability to taxpayers, employees, other levels of government, regulatory bodies, and other stakeholders. It is particularly important for the City to identify its vital records in paper format as there are likely no measures in place for their protection (e.g. fire-resistant file cabinets).

5. The City Clerk's Office will immediately stop loaning original by-laws.

Loaning original by-laws to employees exposes those by-laws to the risk of damage/loss. Scanned images should be provided instead.

6. The City will develop, implement, and periodically test a comprehensive disaster recovery plan.

Employees will need to use records when attempting to continue the delivery of essential City services during a disaster or resume full service delivery after a disaster. Consequently, the disaster recovery plan should identify the data/documents/records required to perform each essential service, where they are located, and how they can be accessed.

7. The City will develop and implement short-term retention periods for network data back-ups.

Network data back-ups should be kept for a relatively short period of time solely for the purposes of recovery in the event of a disaster. In some organizations, daily back-ups are kept only for 24-48 hours and weekly back-ups are kept only for a couple of weeks. Implementation of the proposed indefinite retention of the daily and weekly back-ups will compromise the City's retention compliance.

4.2.6 Information Retention and Disposition

This section describes the City's current information retention and disposition practices and a desired future state.

Note:

1. See Section 4.2.4 for the retention measures proposed by Information Technology Services to address the ever-increasing volume of electronic data.
2. See also Section 4.2.5 for the security of information destruction.

Current State:

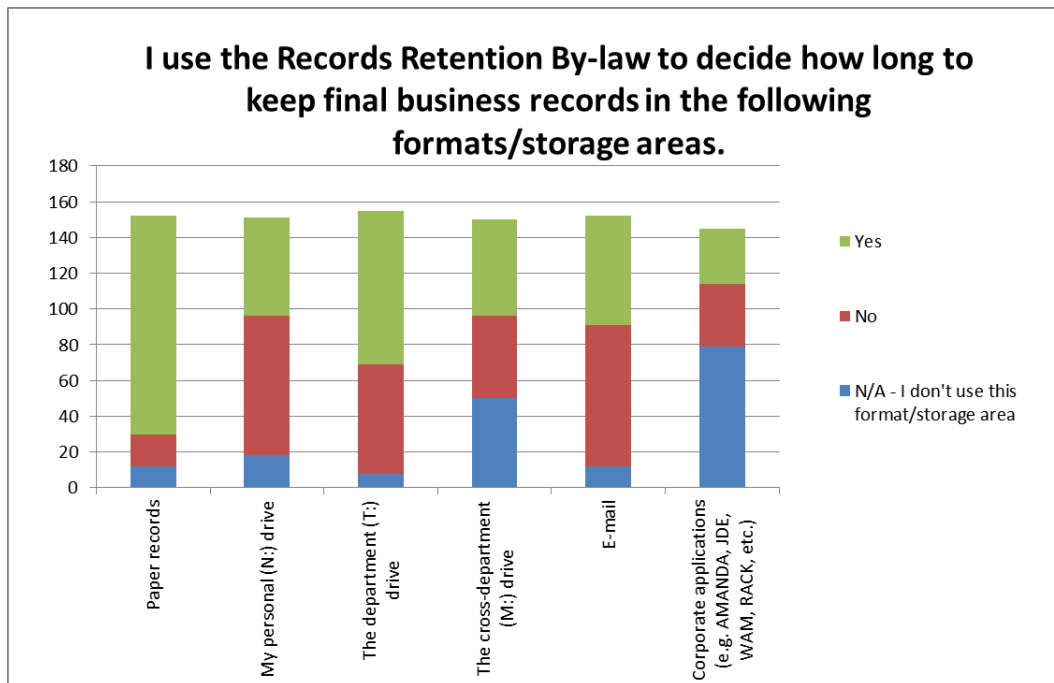
Records Retention Schedule (By-law): As per the *Municipal Act, 2001* (S.O. 2001, c. 25, s. 254-255) and in keeping with 100% of *Comparator Municipalities RIM Survey* respondents, the City has enacted a by-law to govern the retention and disposition of its records.

In 2014, the by-law was amended for the first time in six years. The amendment included corporate business need updates and current legislated requirements, and provided additional guidance for employees (e.g. the identification of documents and materials not covered by the by-law which may be destroyed at an employee's discretion). By way of comparison, *Comparator Municipalities RIM Survey* respondents reported the revision/amendment of their retention by-laws on the following frequencies: 28.5% reported an annual (on average) frequency, 43% reported a three year (on average) frequency, and an additional 28.5% reported a five year (on average) frequency. Going forward, the City anticipates annual amendments to "minimize risk for the City."⁸⁰

64% of *Employee RIM Survey* respondents are aware of the by-law, reporting its most frequent use for paper records (80%) followed by the T: drive as shown in Figure 23 below. Also as shown in Figure 23, some employees say they apply the *Records Retention By-law* to corporate applications such as AMANDA and JDE. That claim is suspect given that many such systems are often not designed with RIM principles, particularly records retention and disposition in mind, and there is no evidence of employees having been trained to apply the by-law to those systems.

⁸⁰ City of Guelph, *Corporate Records Retention By-law Amendment* (Staff Report # CHR 2014-12) [June 10, 2014].

Figure 23 – Records Retention By-law Usage



When asked why they do not use the by-law, the most commonly cited reason was “It is confusing to use” (56%) followed by “The final business records I create/receive aren’t listed in the by-law” (47%).

Deficiencies:

- A six year interval between *Records Retention By-law* amendments
- Less use of the by-law to manage electronic records retention, particularly in corporate applications

Records Holds: The *Records Retention By-law* provides for the temporary suspension of scheduled records disposition in certain circumstances. The use of two terms (‘destruction hold’ and ‘legal hold’) which both refer to legal circumstances is confusing. Contrary to RIM best practices, the by-law suggests the City’s ‘destruction hold’ process may be informal.

Deficiencies:

- Confusing records hold terminology
- Informal ‘destruction hold’ process is contrary to RIM best practices

Records Disposition Authorizations: The *Records Retention By-law* requires a service area/department to complete a records destruction form to identify the records (types and dates) to be disposed of. Written authorization from the appropriate service area/department manager plus the approval of the City Clerk (or designate) is required before disposition may occur. When records are destroyed off-site by a commercial shredding service, the service area/department that requested the destruction is also required to forward the original certification of destruction to the City Clerk's Office.

A modest volume of paper records destructions are reported to the City Clerk's Office each year (e.g. service areas/departments reported the destruction of 364 boxes in 2013-2014). The City Clerk's Office has not received any *Records Destruction Forms* for electronic records, meaning that electronic records dispositions are likely occurring contrary to the by-law.

Deficiencies:

- Employees may be destroying paper records without the City Clerk's approval
- Electronic records disposition practices do not comply with the *Retention By-law*

Desired Future State:

1. The City will develop and implement a new *Records Retention By-law*.

The development of a function-based classification scheme (see Section 4.2.2) will necessitate the development of a new by-law in which records are listed in the same order/sequence as in the classification scheme.

Retention periods will continue to be recommended to management based on the records' business, financial, legal, and (potential) archival values. Legislated retention requirements in applicable Ontario and Canadian federal statutes and regulations will be researched⁸¹. The new retention schedule will continue to be a Council by-law.

In terms of format, the City may wish to prepare one document which contains both the function-based classification scheme and the corresponding retention schedule, thus providing 'one-stop' shopping for the classification and retention of all City records.

⁸¹ The City could complete this research using primary resources available for free on the Internet (e.g. the Ontario statutes and regulations published at www.e-laws.gov.on.ca). Alternatively, the City could complete the research using Carswell's subscription-based service (for which a fee applies) called *Records Retention: Statutes and Regulations* service (Ontario and Canadian federal) or continue to purchase *TOMRMS* updates and map its legislated retention citations to the City's new function-based record series.

2. The City will implement an annual review and amendment of the *Records Retention By-law*.

A records retention by-law requires frequent revision to address changes in service area/department responsibility and retention periods due to changes in business needs and legislated requirements. The by-law also needs to be updated to include new records, otherwise no disposition authority will be in place for those records. By reviewing and amending the by-law once per year, the City will ensure that up-to-date direction is given for the retention and disposition of all City records.

3. The City will promote greater compliance with the *Records Retention By-law*.

Organizations with a low rate of retention schedule compliance typically retain two-thirds more paper records than necessary in active or office storage areas (i.e. approximately one-third of those records should be moved to inactive storage and approximately one-third of those records are eligible for immediate disposition as per the retention schedule). Similarly, many records are kept longer than necessary when the management of inactive paper storage is decentralized.

Low rates of retention schedule compliance also result in the retention of considerable volumes of valueless records in electronic format, resulting in electronic records storage constraints and increasing the amount of time required to back-up and restore those records. If the City is like other organizations, it is likely that a significant volume of its electronically stored information is 'ROT' (redundant, obsolete, or transitory). Greater retention schedule compliance will alleviate those challenges.

Various methods can be used to promote greater compliance with the *Records Retention By-law*. For example:

- Highlight the benefits of by-law compliance in RIM training.
- Develop (or purchase) posters that highlight the benefits of by-law compliance.
- Organize an annual retention and disposition day to encourage service areas/ departments to review records and dispose of them appropriately. Refreshments/lunch could be offered as an incentive. Prizes could also be offered (e.g. a prize to the service area/department that disposes of the largest volume of records).

4. The City will investigate the capability of corporate applications to apply retention rules and implement those rules as soon as it is feasible.

This investigation will determine if/how the City's approved retention periods can be implemented in each corporate application. Should the investigation identify

any application which is incapable of applying retention rules, it may be necessary to consider custom programming or defer the application of the retention rules until that functionality is provided in a future release/upgrade to the application.

5. The City will clarify its 'records hold' terminology and develop a formal process for placing and removing records holds.

Typically, an organization will use one term to describe this type of hold. Should the City continue to use two terms, it is recommended that clarification be provided to more clearly communicate expectations around holds for legal, audit, and *MFIPPA* purposes. It is also recommended that the City implement a formal (i.e. written) process for both placing and removing a hold to provide an audit trail which can be produced in the event the City's hold process is challenged.

Note: The City will implement the hold process only if/as required.

6. The City will promote greater compliance with the records disposition process.

The City may be called upon (e.g. during litigation, audit, or investigation) to demonstrate that it retains and disposes of records in compliance with its *Records Retention By-law*. Failure to adhere to the approved disposition process and, in particular, to make and retain documentation describing the records which were disposed of may expose the City to unfavourable outcomes.

Various methods can be used to promote greater compliance with the records disposition process. For example:

- Highlight the importance of appropriately disposing of records in RIM training.
- Develop (or purchase) posters that highlight the importance of secure disposition.

In addition, as part of RIM compliance monitoring, City Clerk's Office staff would track the disposition documentation it receives from service areas/departments and follow up with those areas/departments that do not routinely submit that documentation.

4.2.7 Managing Archival Records

This section describes the City's current practices for managing archival records and the desired future state for their management.

An organization's archival records have continuing value because they document the organization's history, organization, structure, and functions. Archival records serve as an organization's long-term memory by providing for continuity, evidence of continuing rights and obligations, access to past experience, expertise and knowledge, and an historical perspective. An organization's archives also serve a broader value in that they constitute a part of the cultural heritage of society. The public relies on governments – in particular – to identify, preserve, and make their archival records accessible.

Current State:

Archival Review: The *Records Retention By-law* defines 'archival records' as "records of enduring significance that have historical and business value for the City of Guelph and individuals engaging in historical research" and defines 'archival value' as "the evidential and informational value of record(s), which is determined through an archival review to justify the records long term preservation to retain corporate memory and/or for future historical research."

Like 100% of the comparator municipalities surveyed, records which may have archival value are flagged in the City's *Records Retention By-law* flags for 'archival review'⁸². However, because it is not the City's current practice to have an Archivist review the flagged records, it is not known how much of these records are truly archival. Further, while the by-law identifies groups or categories of (potentially) archival records, those records are not physically identified or segregated.

Deficiencies:

- (Potential) archival records are not physically identified or segregated
- Records backlog pending archival review may result in storage space constraints

Archival Records Storage and Access: The City has not established an archives for storing and providing access to its archival records. Current archives management practices are:

- Some paper records of archival value (e.g. original by-laws) are kept in the City Clerk's Office or in storage in the City Hall basement; however, these records do not receive any

⁸² The by-law defines 'archival review' as "the period of time during which it is determined whether a record has potential long term archival value." Records subject to archival review are marked as "***" (meaning subject to archival selection) in the 'Retention Period' column of the by-law.

special protection (e.g. acid-free folders and boxes are not used, enhanced environmental controls are not provided, etc.).

- The City does not have an index describing the contents and location of its archival records, or its records subject to archival review.
- It is believed that some archival records in paper format are kept by the Guelph Public Library; however, in the absence of documentation, it is not known whether those records were donated or loaned to the Library. Further, the City does not have an index of those records. The storage conditions in which those records are kept is not known.
- The City has not made any provisions to store and provide access to its archival records in electronic format.

By way of comparison, *Comparator Municipalities RIM Survey* respondents store archival records in paper format in the following locations: 57% in the municipality's archives (i.e. a room/facility with special environmental controls), 42.8% in the same place as the municipality's inactive paper records, and 28.5% on loan to a 3rd party archives (e.g. the archives of a university, public library, county/regional government, etc.).

71% of the municipalities surveyed do not manage archival records in electronic format or do not manage them any differently from non-archival electronic records. That few of the surveyed municipalities manage their archival records in electronic format should not be misconstrued as a sign that such records are not important. Rather, it is most likely indicative of a lack of professional expertise (only 2 of the 8 surveyed municipalities have an Archivist position) and management support. Not having a professional Archivist on staff means limited awareness of emerging best practices for the effective, long-term management of electronic records.

Deficiencies:

- Archival records at City facilities are at risk of loss or damage
- Providing access, particularly public access, to the City's archival records is challenging in the absence of an index or a central storage location
- Significant risk that archival records in electronic format will become inaccessible over time in the absence of a digital preservation strategy
- Uncertainty regarding the terms of the agreement with Guelph Public Library for the City's archival records

Digitizing Archives: The *Open Government Action Plan Initiative Interim Report* identifies the digitization of the City's archives as one of three strategies for the City to become a world-leader with respect to the open data component of Open Government. Specifically, the report states: "The utilization of archives is an innovative way to create data assets . . . The council motion resolves that the City "Develop a plan to digitize and freely distribute suitable archival data to

the public” and names the city archives as an asset.”⁸³ Currently there is no project underway to act on this initiative.

Deficiencies:

- Archival data/records not being digitized to support the City's open government initiative

Digital Preservation: Unless an organization has a digital preservation plan, electronic records of archival value will likely not be available to be accessioned into an archives in the future. ‘Digital preservation’ is “The methodologies used to prevent technological obsolescence and/or physical deterioration of digital materials, regardless of whether they were created initially in digital form or converted to digital form.”⁸⁴ The City does not have a digital preservation plan.

One aspect of digital preservation is to select a primary file format for the long-term retention of unstructured content. The City has not established a corporate standard in that regard. By way of comparison, 37.5% of *Comparator Municipalities RIM Survey* respondents use PDF format, 12.5% use TIFF, and 25% do not have a corporate standard.

Deficiencies:

- Electronic archival records and electronic records requiring long-term retention for business, financial, or legal reasons are at risk of loss

Desired Future State:

1. The City’s archival records will be identified, preserved, and made accessible.

For any organization, archival records provide continuity, evidence of continuing rights and obligations, access to past experience, expertise, and knowledge, and an historical perspective. Many archival records are unique, one-of-a-kind items which are irreplaceable if lost or damaged. Therefore, unless archival records are properly identified, preserved, and made available, an organization’s history and culture – and that of a society in the case of a public institution – may ultimately be lost. Society expects public sector organizations to acquire, manage, preserve, and make accessible records of significance that reflect their activities and decisions. By doing so, public

⁸³ Delvinia, *City of Guelph Open Government Action Plan Initiative, Interim Report* [February 27, 2014].

⁸⁴ ARMA International, *Glossary of Records and Information Management Terms*, 4th edition, 2012.

sector organizations foster government accountability and transparency, and allow the public to engage with their documentary heritage.

The development of an archives strategy is a pre-requisite for achieving the desired future state. The strategy will:

- Assess the benefits of preserving the City's archival records, the risks of not preserving them, and the uses to which an archives could be put in the City's ongoing operations.
- Identify resource requirements (e.g. space, staff, procedures, etc.), and estimate the start-up (Year 1) and ongoing (Years 2-4) costs taking into consideration any grants which may be available for each of two options:
 - Establish a City archives
 - Loan/donate the City's archival records to a university archives or a reputable local, regional, or national archival institution
- Recommend an archives strategy, including recommendations regarding the future management of City archival records at the Guelph Public Library.

Implementation of the archives strategy will involve either developing an archives program (including the functions of acquisition and appraisal, arrangement and description, preservation, use, and promotion), or negotiating and implementing loan/donation agreement(s).

Note: Making archival records accessible will include undertaking projects to digitize archival records as recommended in the City's *Open Government Action Plan Initiative Interim Report*.

2. The City will develop and implement a digital preservation strategy⁸⁵.

An ever-increasing volume of the City's records are in electronic format and there is interest in converting additional paper records to digital format. However, electronic records are at significant risk of becoming inaccessible over time due to software, hardware, and storage media obsolescence, as well as data corruption. Therefore, digital continuity is required.

The National Archives (United Kingdom) describes digital continuity as follows⁸⁶: "Digital continuity is the ability to use digital information in the way that you need, for as long as you need. If you do not actively work to ensure digital continuity, your information can easily become unusable. Digital continuity is about making sure that your information is complete, available and therefore usable for your business needs. Your information is usable if you can: a) find it when you need it,

⁸⁵ The development and implementation of this strategy will also ensure that non-archival records with very long-term retention periods (e.g. decades) will also remain accessible for as long as they need to be kept.

⁸⁶ The National Archives (United Kingdom) <http://www.nationalarchives.gov.uk/information-management/manage-information/policy-process/digital-continuity/what-is-digital-continuity/>

b) open it as you need it, c) work with it in the way you need to, d) understand what it is and what it is about, and e) trust that it is what it says it is.”

The strategy should also strive to ensure digital continuity in compliance with the requirements of *The Accessibility for Ontarians with Disabilities Act (AODA)*.

The need for digital continuity is particularly acute for archival records in electronic formats and non-archival records with long-term retention periods (i.e. decades). Unless proactive measures are taken, the City is at risk of having few archival records in the future given the ever-increasing amount of City business that is transacted electronically.

4.3 RIM Communications and Training

This section describes the City's current RIM communications and training practices and a desired future state.

Current State:

RIM Communications: The RIM function publishes a variety of resources in the 'Records and Information Management' area of the City Clerk's Office Intranet site. For example, City employees who visit the site can access the current *Records Retention By-law*, and various procedures, forms (e.g. *Records Destruction Form*), and tools (e.g. *Types of Records and How to Manage Them* which defines and describes how to manage and destroy each of business records, transitory records, and reference materials). It is not known how frequently the site (or individual documents on the site) is accessed.

Policies which affect recordkeeping in some way (RIM-related policies) such as the *Clean Desk Policy*, *Video Surveillance Policy*, and the *Responsible Computing Policy* are kept elsewhere on the City's Intranet. Links are not provided to them from the 'Records and Information Management' area of the City Clerk's Office Intranet site.

Deficiencies:

- Use of RIM resources on the City Clerk's Office Intranet is not tracked
- Links to RIM-related policies elsewhere on the Intranet are not provided

RIM Training: No formal RIM training has been given apart from the third-party delivery of an in-person training session in 2011/early 2012 to educate selected employees in using *TOMRMS* to classify and dispose of records. In the past, the Records and Information Specialist provided *ad hoc* RIM training if/when requested (e.g. how to use the *Retention By-law*).

The Access, Privacy and Records Specialist participated in the 'world café' style training offered periodically for new employees and gave training sessions to individual service areas/ departments upon request. The Access, Privacy and Records Specialist was also working with HR to develop a mandatory, online privacy training program for new employees. It was anticipated that the training would also include RIM. The Access, Privacy and Records Specialist also hoped to schedule a privacy training class (at minimum, once per year) that would also include some consideration of RIM given that good RIM practices support good privacy practices.

Senior management focus group participants stated that more training is required to introduce the City's RIM requirements and expectations, and encourage the adoption of RIM best practices. They expressed the hope that additional training would encourage a centralized/

corporate approach to managing recorded information and eliminate the inefficiencies inherent in the City's current disjointed, *ad hoc*, and often inconsistent practices.

Deficiencies:

- No RIM or access to information/privacy training plan
- No regularly scheduled RIM or access to information/privacy training
- RIM and access to information/privacy training is not mandatory

Desired Future State:

1. The City's will develop and implement a RIM communications strategy.

The recommended RIM vision cannot be realized in the absence of increased awareness and understanding of the importance of RIM, and the publishing of information to support employees in achieving RIM program compliance. (Training is another key element as discussed below). Consequently, a RIM communications strategy is required to raise and sustain RIM awareness, and overcome any misconceptions (e.g. e-mails aren't records) or barriers (e.g. only administrative employees are responsible for RIM). Examples of communications activities that may be undertaken include: briefings at Executive Committee and other meetings of management employees, displays of the City's archival records, and a RIM newsletter for employees.

While the communications should address the benefits of RIM to the City, they should also address the benefits to be accrued by individual employees. The 'what's in it for me' (or WIIFM) factor would be of critical consideration when drafting the strategy and the communications that would derive from it. All communications would be succinct, written in plain language, and focus on the 'must knows' (i.e. provide only the most essential information). The City would benefit from engaging its Corporate Communications staff in crafting appropriate communications in consultation with the Program Manager, Information, Privacy and Elections.

2. The City will develop and regularly provide RIM training.

The development and delivery of RIM and access to information/privacy training are integral to successful RIM program implementation. Training would be required initially as the program was implemented and regularly thereafter to both train new employees and address changes in operational practices, legislated requirements, software functionality, etc. Executive management must support this training and middle management must ensure their direct reports are given time to attend the training.

A training plan would be developed for each group of employees (e.g. management, all existing employees, new employees, etc.). The plans would be developed in stages since RIM policies, procedures, and other tools would be developed and implemented incrementally. The plan would include an outline for each type of training, specifying the learning objectives, content, Trainer activities, and Learner activities. The outline would also indicate the amount of time to be allocated to each subject/activity. The training plan would also identify the optimum delivery method for each type of training (e.g. in-class sessions, lunch and learns, podcasts, etc.). The training would incorporate best practices in adult education to create engaging training, the content and style of which would be tailored to the City's culture and its RIM program.

4.4 Technology

This section describes the City's current technology environment as it relates to RIM and a desired future state.

Note:

1. See Section 4.2.2 for Ernie/Infonet and a central electronic repository.
2. See Section 4.2.3 for electronic collaboration.
3. See Section 4.2.6 for retention rules for corporate applications.

Current State:

Newer/Emerging Technologies: Like most municipalities, the City has a public website.

The City also uses several social media applications⁸⁷ (i.e. Facebook, Flickr, Foursquare, LinkedIn, RSS, SoundCloud, Twitter, and YouTube). As previously stated, the *Social Media Guidelines for Employees* and *Social Media Guidelines for Elected Officials* address various topics such as the importance of maintaining confidentiality and privacy; however, they do not describe how to manage (e.g. organize, store, and retain) the social media content which constitutes a City record. Similarly the City's *Social Media Commenting Guidelines* describe the content types that will not be permitted (e.g. profane language, etc.)⁸⁸ when the City uses a social media site which allows public comments and posts from its users; however, those guidelines also do not describe how to manage the permitted content.

16% of *Employee RIM Survey* respondents use cloud-based file storage or sharing applications (e.g. Dropbox) or communication applications (e.g. Gmail) for City business purposes. The use of communications applications such as Gmail for City business is prohibited under the City's *Responsible Computing Policy*.

The City's *Corporate Technology Strategic Plan* recommends the City provide new capabilities to employees to support collaboration and provide organizational efficiencies and increased productivity⁸⁹. The implementation of some of those technologies (list below) would result in new record formats to be managed:

- Instant messaging⁹⁰.
- Voice and video conferencing.
- Online collaboration spaces for shared document editing, project and task management, and tracking.

⁸⁷ In addition, some City service areas/departments have separate social media accounts (e.g. Guelph Transit uses Facebook, RSS, and Twitter).

⁸⁸ City of Guelph, *Social Media Commenting Guidelines* [June 27, 2014] <http://guelph.ca/news/social-media/social-media-commenting-guidelines/>

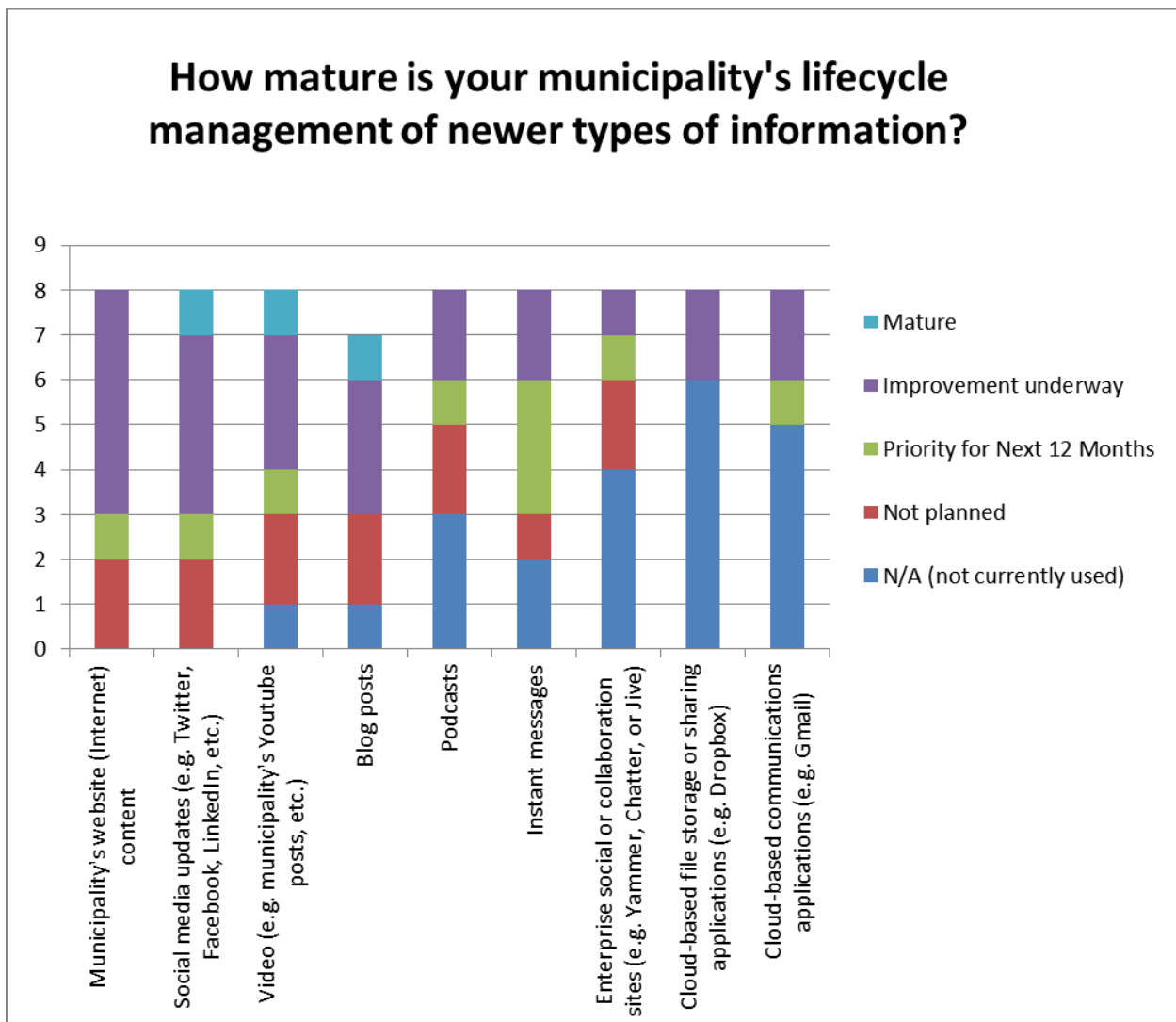
⁸⁹ Prior & Prior Associates Ltd., *City of Guelph Corporate Technology Strategic Plan, Final Report Volume 1* [August 2012].

⁹⁰ City Clerk's Office staff report that the City has an internal IM communicator and that information transmitted using that application is currently treated as transitory.

- Online discussion forums and other team sites.

By way of comparison, Figure 24 below illustrates how *Comparator Municipalities RIM Survey* respondents rated the maturity of their municipalities' lifecycle management of new types of information or storage locations. The responses reveal that improvements are underway for some formats/storage locations (e.g. websites) while other formats/locations are priorities for the next 12 months. However, several of the responding municipalities do not currently use some of these newer information types and others do not plan to manage those that are used.

Figure 24 – Maturity of Lifecycle Management of Newer Information Types



Deficiencies:

- Website content not managed as City records
- Social media content not managed as City records
- Use of third party communications applications (e.g. GMail) for City business contravenes City policy
- RIM principles are not considered when purchasing software

The EDMS: As a result of a 2005 study, the City purchased an electronic document management system (Oracle) and planned a four phase implementation⁹¹:

- User requirements and implementation roadmap.
- Pilot document and records management solution implementation (Fire Department).
- City-wide records management implementation.
- Document management implementation for Information Technology Services.

EDMS licensing and support cost approximately \$60,000 per year. Information Technology Services support for the application is limited to troubleshooting minor issues (e.g. password resets, lost files). None of the hands-on Information Technology Services employees originally involved in the EDMS implementation are still with the City.

City-wide implementation has not occurred and only two areas have adopted the EDMS as a formal business practice: three Clerk's Office employees use it to collate and prepare the Council and Committee meeting packages (agenda, reports, and minutes) and approximately six Water Services employees use it to manage documents/records related to the Water Quality Management System that were formerly kept in folder-based network storage. In addition, a handful of Information Technology Services employees previously used the EDMS informally to manage meeting documents.

Some City employees believe the low use results from an unsuccessful implementation in which the EDMS was positioned only as an IT system roll-out. City employees noted that implementation occurred in the absence of a classification structure and naming conventions, or the completion of a network drive clean-up. Further, system transfer and training were reportedly prolonged.

Prior & Prior Associates Ltd., the author of the City's *Corporate Technology Strategic Plan*, identified a number of implementation challenges with the City's EDMS such as lack of policy and procedural frameworks, Information Technology Services staff turnover, and lack of

⁹¹ City of Guelph – Information Technology Services, *EDMS Project Charter* [December 2, 2010 and modified June 27, 2011].

portfolio and project management⁹². They also identified a number of key gaps, several of which they attributed to the lack of a RIM program to provide the necessary direction and standardization. The RIM-related key gaps identified by Prior & Prior Associates Ltd. are:

- Failure to implement the *TOMRMS* classification in the EDMS.
- Poorly defined records retention policy/practices.
- Limited use/configuration of metadata.
- Lack of standards results in *ad hoc*, unmanaged EDMS use (Prior & Prior says this results “in a replica of the t:\ drive mess”)⁹³.
- The Records Management module is not used.
- No automated workflows have been configured.
- There is limited understanding and application of a security model.

Prior & Prior Associates Ltd. concluded that neither implementation (Clerk’s Office or Water Services) is meeting the intended needs, none of the City’s Information Technology Services employees have a full understanding of the system’s capabilities due to staff turnover and the protracted rollout schedule, and the City lacks “corporate policy or procedure frameworks to guide and support records and electronic document management.”⁹⁴

Prior and Prior Associates Ltd. recommended: “All work on the EDMS should be deferred until a corporate direction can be set, corporate sponsorship and program ownership established, and the necessary policy, procedure and governance frameworks put in place to guide future work in this area.”⁹⁵ The City was also encouraged to learn from its experience (and those of others) and adopt several “future strategies and tactics . . . to achieve a more successful outcome with EDMS implementation”⁹⁶ such as establishing policy, procedure, and process frameworks to support implementation, using a formal project management approach, and staffing EDMS projects for sustainability.

By way of comparison, just over one-third of *Comparator Municipalities RIM Survey* respondents have an ECM (enterprise content management) system⁹⁷ and those municipalities

⁹² Prior & Prior Associates Ltd., *Corporate Technology Strategic Plan*, Final Report, Volume 2 – Supporting Information [undated].

⁹³ *Ibid.*

⁹⁴ Prior & Prior Associates Ltd., *City of Guelph Corporate Technology Strategic Plan, Final Report Volume 2* [August 2012].

⁹⁵ *Ibid.*

⁹⁶ *Ibid.*

⁹⁷ Gartner defines ‘enterprise content management’ as follows: “Enterprise content management (ECM) is used to create, store, distribute, discover, archive and manage unstructured content (such as scanned documents, email, reports, medical images and office documents), and ultimately analyze usage to enable organizations to deliver relevant content to users where and when they need it.” <http://www.gartner.com/it-glossary/enterprise-content-management-ecm/> In its *Records and Information Management Definitions*, the City defines ‘enterprise content management’ as “An integrated set of software functions providing records management, document management, imaging, end-user collaboration, workflow management, web content management, and common cross-system search, security and metadata capture, that is used to a) capture, classify, secure, manage, and store electronic documents within a common content repository, b) apply recordkeeping rules in accordance with legislation, policy and standards, and c) manage the collaborative creation, review and approval of new content.”

are very diverse in size: one municipality has 401-600 employees, a second has 1,201-1,400 employees, and the third has 1,801-2,000 employees. As shown in Figure 25 below which summarizes the responses to all ECM questions in the *Comparator Municipalities RIM Survey*, the respondents reported variations in record and user types, and no municipality reported having any ECM system compliance measures.

Figure 25 – ECM Systems Used by Comparator Municipalities

#	ECM System Name	When (year) was the system first implemented?	Who uses the ECM system? (i.e. employees in all departments or only selected departments)	What type of records are stored in the ECM system? (i.e. final/approved records only or records of any status including drafts)	Please describe any methods used to monitor compliance in using the (any) ECM system.
1	OpenText Livelink	2000-2001	47 business units out of 120	Any status	None
2	HP TRIM	1998	all employees	Final approved records	(No response given)
3	Documentum	2010	all employees	By-laws, minutes and agendas (all PDFs) plus an index to physical records (that information is from a follow-up phone call)	No compliance monitoring at present; a monitoring strategy will be developed in the future (that information is from a follow-up phone call)
	Sharepoint enhancements to Documentum	2015 (planned)	all employees	The goal will be to capture all electronic records (that information is from a follow-up phone call)	N/A

Deficiencies:

- Unsuccessful EDMS implementation
- EDMS use occurs without the necessary RIM framework

Data Management: For its 2014 annual report, Information Technology Services assessed the City's data needs and how those needs correspond to its data management disciplines using the Info-Tech Research Group's *Data Management Capabilities Assessment Tool* which is modelled on *The DAMA Guide to the Data Management Body of Knowledge (DAMA-DMBOK Guide)*. The tool also computed the City's data management activity performance as shown in Figure 26 below.

Figure 26 – The City’s Data Management Activity Performance⁹⁸

Data Management Activity	Score	Recommendation
Data management planning	42.3/100	Ensure policies are formally documented and adhered to
Data management control	41.7/100	Review your plans to ensure steps are in place to maintain and control the implemented data management processes
Data management development	46.7/100	Review and ensure that proper design and review occurs to improve discipline performance
Data management operations	46.7/100	Focus your efforts on improving the day to day operations of your data management technology and processes

The *Corporate Technology Strategic Plan* recommends the establishment of “a data warehouse to provide a repository of the selected views and data tables from the systems, as well as the repository for end user reports.”⁹⁹ It also recommends that IT take the lead in this project with involvement from key power users of the various systems. Information Technology Services has begun to develop a data warehouse and the Corporate Data Architect’s 2015 work plan is focused on master data management, the objective of which is to develop a central data master registry that will be used by all applications to ensure one system of record and eliminate duplication.

Deficiencies:

- No formal governance linkage between RIM and data management

Open Government: The City’s strategic plan identifies Open Government as one of the frame changers which are key to transforming local government in Guelph. An information sheet on the frame changers states: “Open Government Plan – Open Government creates a more transparent and accountable administration; making the best use of technology, it enables collaboration in service delivery solutions that drive continuous improvement.”¹⁰⁰ As shown in Figure 27 below, access to information figures prominently in the City’s open government plans.

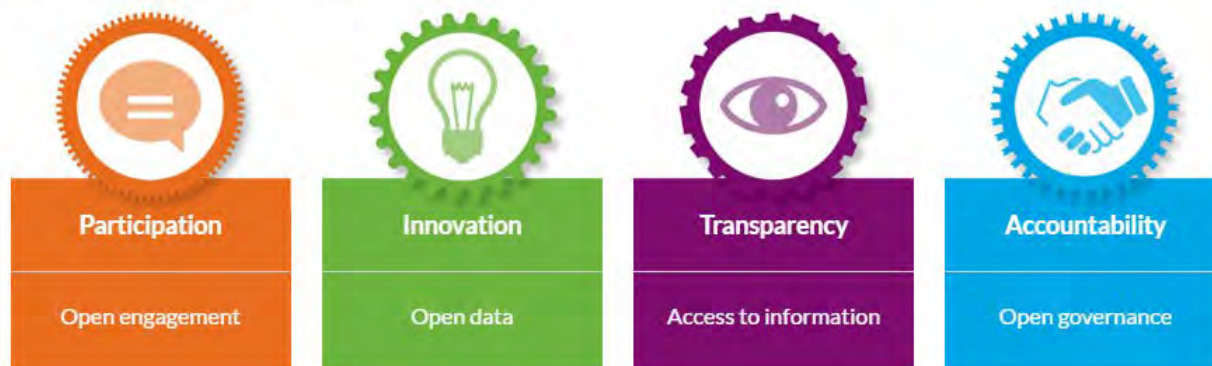
⁹⁸ City of Guelph, *Data Management Capabilities Assessment Tool* [undated].

⁹⁹ Prior & Prior Associates Ltd., *City of Guelph Corporate Technology Strategic Plan, Final Report Volume 2* [August 2012].

¹⁰⁰ City of Guelph, *2014+ Corporate Priorities* [undated].

Figure 27 – The City’s Open Government Principles and Directions¹⁰¹

Open government principles and directions



The importance of information to the City’s open government initiatives is highlighted in the following recommendations from the City’s *Open Government Action Plan*¹⁰²:

- Action 6.1 calls for the City to open up and release data unless there are privacy, security, or legal reasons for not sharing it. Among other things, the achievement of this action will require the development of metadata standards to “create standardized ways to categorize City information and machine-readable data to ensure effectiveness and efficiency in the management, sharing and using of City data.”
- Action 6.2 calls for the creation of “an information management infrastructure to manage pertinent information in digital formats, including documents, records and digital assets with priority content around financial information (e.g. budgets) and Council decisions (e.g. bylaws and votes)” and “a catalogue of sharable City of Guelph data that includes an easy-to-understand inventory and classification system”.

The close connection between open government and information management, and specifically an organization’s RIM practices, can be summarized as follows:

“Successful Open Government . . . rests on evidence of government decisions, actions and transactions, which is largely derived from official government records. Good records management ensures that accurate and reliable records are created and remain accessible, usable and authentic for as long as required to provide the basis for improving services, controlling corruption and strengthening democracy. When records are reliable, Open Data and ATI [access to information] become

¹⁰¹ City of Guelph, <http://open.guelph.ca/framework/>

¹⁰² City of Guelph, *Open Government Action Plan* [August 2014]

<http://open.guelph.ca/wp-content/uploads/2014/01/OpenGovernmentActionPlan.pdf>

powerful means of ensuring government transparency and enabling citizens to take ownership of and participate more fully in their governments.”¹⁰³

Deficiencies:

- No formal governance linkage between RIM and open government

Desired Future State:

Note: See Section 4.1.1 for a recommendation to implement a formal governance linkage between RIM and data management, and between RIM and open government.

1. The City will manage information/records on its public website according to RIM best practices.

Some website content is a copy of a record stored elsewhere (e.g. a brochure), the official record of which would be managed outside the web environment as part of the overall RIM strategy. Other content is not published to the website, instead being pulled from a back-end database and then displayed on the website as a record. Managing that record content is particularly challenging given its dynamic nature. A third possible content type is user-supplied content submitted through online forms and comments (e.g. comments on a blog posting). When any of those content types constitute a record, it should be managed in accordance with the requirements and best practices of the RIM program. That means website record content needs to be captured, stored securely, and retained according to the *Records Retention By-law*. It may be necessary for legal or other purposes for the City to be able to demonstrate what content was – and was not – on its website on a certain date.

A strategy for managing website records content is, therefore, required. The strategy would include, but not necessarily be limited to, identifying the website content which constitutes a record and mechanisms to capture and preserve those records in a searchable/accessible format for their approved retention periods.

2. The City will manage information/records in its social media content according to RIM best practices.

Just as with a website, some of the content communicated via social media constitutes a record. Every Tweet or other social media activity (e.g. a Facebook posting) represents a potential record that must be managed so the City can embrace RIM best practices, benefit organizationally, and be compliant with regulatory and, potentially, discovery

¹⁰³ International Records Management Trust, *Benchmarks for Open Government and Trustworthy Records* [2013] <http://www.irmt.org/portfolio/open-government-trustworthy-records>

requirements. Consequently, a strategy is required for managing social media records in accordance with the requirements and best practices of the RIM program.

The effective management of social media content depends on successfully extending RIM principles to managing the creation, capture, storage, and retention of that content. Without those controls, the City will be unable to identify, collect, store, and preserve the social media content which constitutes an organizational record.

3. The City will proactively identify and manage according to RIM best practices the RIM implications of future technologies.

There is a tendency in organizations to implement new technologies without taking their RIM implications into consideration. For example, when e-mail systems were introduced, the focus was on the communications benefits they would provide. Very few organizations had the foresight to plan to manage the large volume of messages in those systems which would be organizational records. The resulting accumulation of hundreds of thousands (or millions) of messages organized in *ad hoc* ways and indefinitely retained present RIM challenges on a number of fronts (e.g. the application of retention periods). To avoid similar situations in the future, a proactive approach is required to identify the RIM implications of future emerging technologies and plan to manage according to RIM best practices the information/ records created in, transmitted via, or stored in those technologies.

4. The City will consider RIM principles when purchasing new software.

As stated in Section 5.1, the eight principles in the *Generally Accepted Recordkeeping Principles*® (i.e. accountability, transparency, integrity, protection, compliance, availability, retention, and disposition) apply to the management of all of the City's recorded information (i.e. data, information, and records). It is, therefore, recommended that the City develop standard RIM requirements to be included in RFPs for all future software purchases to ensure RIM principles are considered prior to solution selection. In particular, requirements for retention and disposition should be developed to ensure that any future systems are capable of applying retention periods and disposing of information that is no longer required.

5. The City will implement a more robust ECM (enterprise content management) system to replace the EDMS and benefit from the expanded functionality of ECM technology.

It is clear that improvements are required to address the City's current challenges in managing electronic records, introduce best practices, and take advantage of the functionality provided by new technologies (e.g. collaboration spaces, managing social media content, etc.). The status quo – whereby most electronic documents/records are

stored in personal or shared drives or e-mail accounts while a handful of employees use selected functions in the City's EDMS – is not an option.

It is recommended that the City complete a detailed analysis to identify and prioritize its ECM requirements from the RIM, privacy, security, IT, and user perspectives and in consideration of AODA requirements if the public will interact with the ECM in any way. It is also recommended that the City complete preliminary investigations of the features/ functionality of ECM systems and the anticipated implementation costs (software purchase, professional services, and technology upgrades such as a new server) and ongoing maintenance costs. The investigation would include ECM systems of different complexities (e.g. Tier 1 systems such as OpenText or EMC/Documentum) and Microsoft SharePoint 2013¹⁰⁴. A business case would be prepared for management. Assuming the business case was successful and funding was secured, the City would begin planning the ECM implementation.

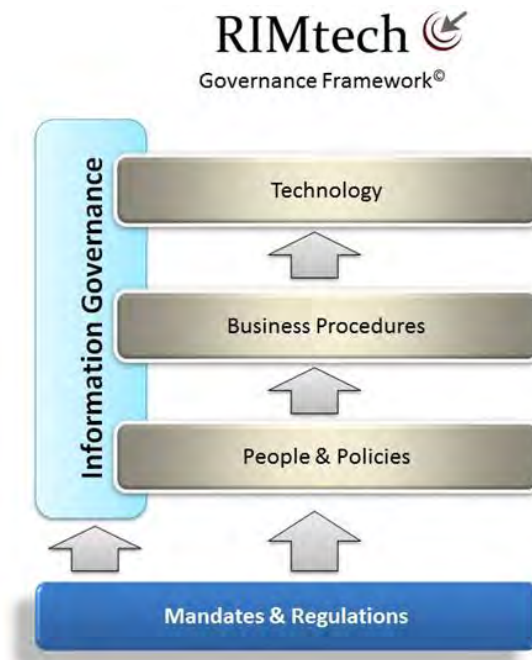
Historically, many EDMS implementations were not successful and some ECM implementations are proving similarly unsuccessful. Because “A successful electronic recordkeeping project requires a significant emphasis on business culture and organizational change, concrete measurement of goals and outcomes, and complete command of the software technology's capabilities and limitations, all within a consistent governance framework”¹⁰⁵, Ergo recommends the City use the twelve step implementation methodology developed by RIMtech to significantly increase the likelihood of having a successful ECM implementation. That methodology is based on the three stage governance framework in Figure 28 below. As stated on RIMtech's website, “Each governance step calls for 4 discrete steps to be carried out. Each of the three stages (People, Procedures, and Technology) is independently measured for success before proceeding to the following stage. This removes the risk of failure, ensuring you are constantly building on success.”

Note: RIMtech's methodology is for implementing an EDRMS (electronic document and records management system). Most software vendors instead use the term 'ECM' or 'enterprise content management'. Therefore, references in RIMtech's methodology to 'EDRMS' can be read as 'ECM'.

¹⁰⁴ Because SharePoint 2013 out of the box continues to lack some necessary RIM functionality (e.g. the ability to use retention event triggers), the investigation should include options for using SharePoint along with a commercially available plug-in (e.g. Collabware CLM which also manages paper/hard copy records, GimmelSoft Information Governance Suite for Microsoft SharePoint, etc.) to provide the missing RIM functionality and explore the feasibility of using SharePoint as the front-end to a Tier 1 ECM system to provide a user-friendly environment while achieving cost savings through the purchase of less costly, but also limited, ECM user licenses for the majority of users.

¹⁰⁵ RIMtech <http://www.rimtech.ca/rimtech-edrms-implementation-methodology.html>

Figure 28 – The RIMtech Governance Framework for EDRMS Implementation¹⁰⁶



6. The City will develop and implement a standards-compliant image management program.

The City should develop and implement a standards-compliant¹⁰⁷ image management program if it decides to convert existing collections of paper records to image format or if it decides to implement day-forward processes requiring new paper records to be converted to digital images.

Note: Given the costs involved to create and maintain images that will satisfy industry standards and the requirements of evidence laws, digitization projects should not be undertaken without careful analysis. The City would conduct a records digitization feasibility assessment for each proposed digitization project to thoroughly examine the intended use(s) of the images, the retention period of the source documents, the productivity or other benefits imaging would provide, the constraints or limitations of imaging the records, storage space requirements (image files tend to take up a lot more space than, for example, a PDF rendered from a Word file), and the costs to both image the records and maintain the images over time. The assessment would also identify any records which must be kept in paper/hard copy format to satisfy legal (or other) requirements. The goal of the assessment would be to ensure only the records most suitable for imaging were imaged because of their value to the City, their condition, their frequency of use, etc.

¹⁰⁶ RIMtech <http://www.rimtech.ca/rimtech-edrms-implementation-methodology.html>

¹⁰⁷ Canadian General Standards Board standard: Microfilm and Electronic Images as Documentary Evidence (CAN/CGSB-72.11-93).

5. RIM Strategy

This section provides a recommended vision for the future of RIM at the City and lists the goals for each recommended strategic priority (Section 5.1). Action plans (Section 5.2) for achieving the objectives for each goal and a high-level timeline for the prioritized and phased implementation of the RIM Strategy (Section 5.3) are also provided. Section 5.4 provides estimated implementation costs.

The following terms are used in this section:

1. **Strategic priority:** An overarching area of activity. There are four strategic priorities:
 - RIM Governance
 - RIM Processes
 - RIM Training and Communications
 - Technology
2. **Goal:** A general statement of the end toward which the City's resources will be directed. A strategic priority may have one or more goals.
3. **Objective:** A general description of the action(s) required to achieve a goal. More than one objective may be required to achieve a goal. The objectives arise from the desired future state descriptions in Section 4.

5.1 Recommended RIM Vision, Strategic Priorities, and Goals

This section provides a recommended vision for the City's future RIM initiatives, and identifies the goals of each RIM strategic priority.

Recommended RIM Vision Statement:

The City of Guelph's recorded information will be managed in accordance with law, policy, standards, and procedure to support program and service delivery, foster informed decision-making, facilitate accountability, transparency, and collaboration, and preserve and ensure access to recorded information for the benefit of present and future generations.

Elaboration:

Records and information are critical and strategically important assets. Like financial and human resources, records and information must be effectively managed using defined principles reflected in documented practices, policies, standards, procedures, business rules, and facilitating tools and technologies.

The City will conduct each stage in the RIM life cycle in a disciplined and methodical manner, thus permitting more effective and efficient operations, optimizing the value of its investment in

information assets, supporting better decision-making, and providing for improved sharing of information both within internally and with key external stakeholders.

The City's management of recorded information (data, information, and records) will be guided by the eight *Generally Accepted Recordkeeping Principles*[®]:

Principle	Definition
Accountability	A senior executive (or person of comparable authority) shall oversee the information governance program and delegate responsibility for RIM to appropriate individuals. The organization adopts policies and procedures to guide personnel and ensure that the program can be audited.
Transparency	An organization's business processes and activities, including its information governance program, shall be documented in an open and verifiable manner, and the documentation shall be available to all personnel and appropriate interested parties.
Integrity	An information governance program shall be constructed so the information generated by or managed for the organization has a reasonable and suitable guarantee of authenticity and reliability.
Protection	An information governance program shall be constructed to ensure a reasonable level of protection to records and information that are private, confidential, privileged, secret, classified, essential to business continuity, or that otherwise require protection.
Compliance	An information governance program shall be constructed to comply with applicable laws and other binding authorities, as well as with the organization's policies.
Availability	An organization shall maintain records and information in a manner that ensure timely, efficient, and accurate retrieval of needed information.
Retention	An organization shall maintain its records and information for an appropriate time, taking into account its legal, regulatory, fiscal, operational, and historical requirements.
Disposition	An organization shall provide secure and appropriate disposition for records and information that are no longer required to be maintained by applicable laws and the organization's policies.

Given the City's increasingly electronic work environment, a cultural shift will be required to achieve this vision and meet the needs of employees and stakeholders. New and improved RIM practices will be implemented and sustained to reliably manage the lifecycle of all information resources so that:

- Information is created in a standardized way.
- Information is classified meaningfully.
- Information is easily retrievable and usable in the course of decision-making, service delivery, and all other municipal functions.
- Information is accessible for authorized uses.
- Information is shared and used more effectively.
- Information is protected from alteration, loss, or unauthorized disclosure.
- Information is kept only as long as defined in the *Records Retention By-law* or until the expiration of any (legal) hold.
- Information not subject to a (legal) hold is appropriately disposed of, leaving a record/ audit trail of its disposition.
- RIM is perceived by employees and management to make a demonstrable contribution to the attainment of the City's strategic goals.

Goals have been identified for each of the strategic priorities as listed below in Figure 29.

Figure 29 – Strategic Priorities and Goals

Strategic Priority	Goal #	Goal
RIM Governance	A1	To develop, implement, and sustain a RIM governance model
	A2	To develop, implement, and regularly review a comprehensive suite of RIM/recordkeeping and RIM-related policies
	A3	To establish and sustain a staffing model to provide RIM expertise.
	A4	To develop and implement a RIM compliance monitoring program
RIM Processes	B1	To manage information creation, capture, and declaration
	B2	To manage information classification, search, retrieval and access
	B3	To manage information sharing and collaboration
	B4	To manage information storage
	B5	To manage information privacy, security, and protection from disaster
	B6	To manage information retention and disposition
	B7	To manage archival records
RIM Training and Communications	C	To develop and implement RIM communications and training
Technology	D	To implement and sustain technology that supports the RIM program and to proactively address the RIM implications of technology

5.2 RIM Strategy Action Plans

This section provides an action plan for achieving each goal.

All goals in the RIM Strategy are important and their collective accomplishment will ensure the strategy's successful implementation. However, it is helpful to assign a priority to each objective for planning purposes. A priority has been assigned to each objective as per the categorizations and colour-coding in Figure 30 below.

Figure 30 – Priorities of RIM Strategy Objectives

	Low	An objective whose implementation can be deferred until later in the 5 year implementation timeline with no negative effect.
	Medium	An objective which is not otherwise categorized.
	High	An objective which establishes the foundation for successfully implementing the RIM Strategy. High priority objectives should be completed first.
	Quick Win	An objective with low implementation effort and low cost. Implementation of a quick win objective will provide immediate benefit.

Note: Accountability for leading an objective lies with the first service area/department or position listed in the 'Responsibility' column when more than one area/department or position is listed.

Responsibility Legend in the Action Plans:

Program Manager = Program Manager, Information, Privacy and Elections

ITS = Information Technology Services

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STRATEGIC PRIORITY: RIM GOVERNANCE				
GOAL #: A1				
To develop, implement, and sustain a RIM governance model				
Objective #	Objective	Dependencies (if any)	Responsibility	Key Performance Indicators
A1.1	Establish an Information Governance Committee (IGC)		Deputy CAO Corporate Services	IGC has been established and has begun to meet
A1.2	Establish a new steering committee (a RIM/Privacy Steering Committee) and continue the existing IT Steering Committees	A1.1	Information Governance Committee	RIM/Privacy Steering Committee has been established and has begun to meet IT Steering Committees have continued to meet
A1.3	Establish a Corporate RIM/Privacy Liaison Group		Information Governance Committee	Liaison Group has been established and has begun to meet
A1.4	Continue RIM responsibility under the City Clerk		Deputy CAO Corporate Services	City Clerk has continued to be responsible for RIM
A1.5	Formally assign archival records responsibility to the City Clerk		Deputy CAO Corporate Services	Formal responsibility has been assigned

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STRATEGIC PRIORITY: RIM GOVERNANCE				
GOAL #: A2				
To develop, implement, and regularly review a comprehensive suite of RIM/recordkeeping and RIM-related policies				
Objective #	Objective	Dependencies (if any)	Responsibility	Key Performance Indicators
A2.1	Develop and implement a RIM policy		Program Manager RIM Specialist Provide input: ITS; Legal	RIM policy has been developed and implemented
A2.2	Finalize and implement the draft recordkeeping policies	A2.1	Program Manager RIM Specialist Provide input: ITS; Legal	Draft recordkeeping policies have been finalized and implemented
A2.3	Develop and implement additional recordkeeping policies	A2.1	Program Manager RIM Specialist Provide input: ITS; Legal	Additional recordkeeping policies have been developed and implemented
A2.4	Review the RIM-related policies, revise them if/as required to (fully) address RIM implications, and implement the revised policies		Program Manager RIM Specialist Policy owner for RIM-related policies	RIM-related policies have been reviewed and revised if/as required to (fully) address RIM implications
A2.5	Review RIM/recordkeeping and RIM-related policies every two years, revise them if/as required, and implement the revised policies	A2.1 A2.2 A2.3 A2.4	Program Manager RIM Specialist Policy owner for RIM-related policies	RIM/recordkeeping and RIM-related policies are reviewed every two years and revised if/as required

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STRATEGIC PRIORITY: RIM GOVERNANCE				
GOAL #: A3				
To establish and sustain a staffing model to provide RIM expertise.				
Objective #	Objective	Dependencies (if any)	Responsibility	Key Performance Indicators
A3.1	Establish a RIM Specialist position		City Clerk	Position has been established and an RIM Specialist has been hired
A3.2	Use internships, co-op placements, practicums, temporary employment contracts and/or engage consultants to provide the additional skill sets and/or capacity required to support corporate RIM program development and implementation		Program Manager	Additional skills sets and/or capacity provided to support corporate RIM program development and implementation
A3.3	Develop and implement a plan to provide additional resources every four years to offset the time the Program Manager, Information, Privacy and Elections will spend co-ordinating the municipal election event		Program Manager	Additional resources provided to offset the Program Manager's time spent co-ordinating the municipal election event every four years

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STRATEGIC PRIORITY: RIM GOVERNANCE				
GOAL #: A4				
To develop and implement a RIM compliance monitoring program				
Objective #	Objective	Dependencies (if any)	Responsibility	Key Performance Indicators
A4.1	Develop, implement, and periodically review measures to audit compliance with the RIM/recordkeeping policies	A2.1 A2.2 A2.3	Program Manager RIM Specialist Provide input: ITS; Legal; Internal Audit Selected service area/ department representatives may assist in implementing the review measures	Measures to audit compliance have been developed and implemented, and are reviewed periodically
A4.2	Develop, implement, and periodically review measures to audit compliance with the RIM aspects of other City policies	A2.4	Program Manager RIM Specialist Policy owner Provide input: ITS; Legal; Internal Audit Selected service area/ department representatives may assist in implementing the review measures	Measures to audit compliance have been developed and implemented, and are reviewed periodically

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STRATEGIC PRIORITY: RIM PROCESSES				
GOAL #: B1				
To manage information creation, capture, and declaration				
Objective #	Objective	Dependencies (if any)	Responsibility	Key Performance Indicators
B1.1	Review business processes to ensure all necessary records are being created, that they contain the necessary information, and that records are not being created unnecessarily		RIM Specialist Service area/department representatives	1) All necessary records are created 2) Created records contain the necessary information 3) No unnecessary records are created
B1.2	Determine the format in which records should be captured and implement those decisions	B1.1	Program Manager RIM Specialist Service area/department representatives ITS	Records are captured in the most appropriate and cost-efficient format

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STRATEGIC PRIORITY: RIM PROCESSES				
GOAL #: B2				
To manage information classification, search, retrieval and access				
Objective #	Objective	Dependencies (if any)	Responsibility	Key Performance Indicators
B2.1	Review and assess information retrieval in Ernie/Infonet and implement improvements		ITS Program Manager Provide input: Service area/department representatives	Review has been completed
B2.2	Assess the feasibility of creating a central electronic repository to store documents/ records of interest, use, and/or benefit to all employees and implement the repository if feasible	B2.1	ITS Program Manager Provide input: Service area/department representatives	Feasibility has been assessed
B2.3	Develop and implement a function-based records classification scheme		RIM Specialist Provide input: Service area/department representatives	Function-based records classification has been developed and implemented, and is being maintained
B2.4	Develop and implement conventions for naming electronic files		RIM Specialist Provide input: Service area/department representatives	Electronic record file naming conventions have been developed and implemented, and are being maintained

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STRATEGIC PRIORITY: RIM PROCESSES				
GOAL #: B3				
To manage information sharing and collaboration				
Objective #	Objective	Dependencies (if any)	Responsibility	Key Performance Indicators
B3.1	Promote the use of the City's electronic collaboration resources		ITS Corporate Communications Provide input: Program Manager; RIM Specialist	Promotion has been completed
B3.2	Explore the feasibility of introducing enhanced collaboration spaces and implement those spaces if feasible	B3.1	ITS Provide input: Program Manager; service area/ department representatives; RIM Specialist	Feasibility has been explored

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STRATEGIC PRIORITY: RIM PROCESSES				
GOAL #: B4				
To manage information storage				
Objective #	Objective	Dependencies (if any)	Responsibility	Key Performance Indicators
B4.1	Investigate, recommend, and implement the location(s) in which inactive paper records will be stored in the future		Program Manager Provide input: RIM Specialist; service area/ department representatives	Investigation has been completed, recommendations have been made, and the location(s) have been implemented
B4.2	Provide the necessary infrastructure (policy/procedures, technology, and training) before implementing any e-mail mailbox or file share storage quotas/limits		ITS Program Manager Provide input: service area/department representatives	Viable alternatives have been provided before implementing the quotas/limits
B4.3	Assess the adequacy of the RIM and privacy protection provisions in cloud applications and renegotiate those provisions to ensure the implementation of best practices if/where applicable		Program Manager ITS Legal	Assessment has been completed and provisions have been renegotiated if/where applicable
B4.4	Plan and implement paper and electronic records clean-up projects		RIM Specialist ITS Provide input: service area/department representatives	Clean-up projects planned and implemented

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STRATEGIC PRIORITY: RIM PROCESSES				
GOAL #: B5				
To manage information privacy, security, and protection from disaster				
Objective #	Objective	Dependencies (if any)	Responsibility	Key Performance Indicators
B5.1	Develop and implement an information security classification		RIM Specialist ITS Provide input: service area/ department representatives	Information security classification developed and implemented
B5.2	Review and provide secure information destruction at all City facilities		Program Manager Provide input: RIM Specialist; service area/ department representatives	Secure, cost-effective information destruction is provided at all City facilities
B5.3	Transfer funding for the shredding of paper records to the City Clerk's Office		Deputy CAO Corporate Services	Funding has been transferred
B5.4	Develop and implement a vital records program		RIM Specialist Provide input: ITS; service area/ department representatives	Vital records program developed and implemented
B5.5	Immediately stop loaning original by-laws		City Clerk	Original by-law loans have ceased
B5.6	Develop, implement, and periodically test a comprehensive disaster recovery plan		Emergency Preparedness ITS Program Manager Provide input: service area/ department representatives	Comprehensive plan developed, implemented, and periodically tested
B5.7	Develop and implement short-term retention periods for network data back-ups		ITS Provide input: Program Manager	Short-term retention periods developed and implemented

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STRATEGIC PRIORITY: RIM PROCESSES				
GOAL #: B6				
To manage information retention and disposition				
Objective #	Objective	Dependencies (if any)	Responsibility	Key Performance Indicators
B6.1	Develop and implement a new <i>Records Retention By-law</i>	B2.3 (develop a function-based records classification scheme)	Program Manager RIM Specialist	New retention by-law developed and implemented
B6.2	Implement an annual review and amendment of the <i>Records Retention By-law</i>		Program Manager RIM Specialist	Commitment made and annual work plan updated accordingly
B6.3	Promote greater compliance with the <i>Records Retention By-law</i>		Program Manager RIM Specialist	Greater compliance promoted
B6.4	Investigate the capability of corporate applications to apply retention rules and implement the rules as soon as it is feasible.		ITS Program Manager	Rules applied to govern the retention and disposition of data/ records in corporate applications
B6.5	Clarify the 'records hold' terminology and develop a formal process for placing and removing records holds		Program Manager Legal	Terminology standardized and formal process implemented
B6.6	Promote greater compliance with the records disposition process		Program Manager RIM Specialist	Greater compliance promoted

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STRATEGIC PRIORITY: RIM PROCESSES				
GOAL #: B7				
To manage archival records				
Objective #	Objective	Dependencies (if any)	Responsibility	Key Performance Indicators
B7.1	Identify, preserve, and make archival records accessible	Develop an archives strategy (the strategy's development is part of this objective)	Program Manager Archival consultant (archives strategy) RIM Specialist	Archival records identified, preserved, and made accessible
B7.2	Develop and implement a digital preservation strategy		Program Manager ITS RIM Specialist	Strategy developed and implemented

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STRATEGIC PRIORITY: RIM COMMUNICATIONS AND TRAINING				
GOAL #: C				
To develop and implement RIM communications and training				
Objective #	Objective	Dependencies (if any)	Responsibility	Key Performance Indicators
C1	Develop and implement a RIM communications strategy		Program Manager Corporate Communications RIM Specialist	Strategy developed and implemented
C2	Develop and regularly provide RIM training	Various objectives for the development of RIM policies, procedures, and tools (i.e. the items on which employees will be trained)	Program Manager RIM Specialist	Training developed and regularly provided

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STRATEGIC PRIORITY: TECHNOLOGY				
GOAL #: D				
To implement and sustain technology that supports the RIM program and to proactively address the RIM implications of technology				
Objective #	Objective	Dependencies (if any)	Responsibility	Key Performance Indicators
D1	Manage information/records on the public website according to RIM best practices		Webmaster Program Manager ITS	Website information/records managed
D2	Manage information/records in social media content according to RIM best practices		Social media content administrators Program Manager ITS	Social media information/records managed
D3	Proactively identify and manage according to RIM best practices the RIM implications of future technologies		ITS Program Manager	RIM implications proactively identified and managed
D4	Consider RIM principles when purchasing new software		ITS Program Manager	RIM principles identified and considered prior to software selection
D5	Implement a more robust ECM (enterprise content management) system to replace the EDMS and benefit from the expanded functionality of ECM technology		Program Manager ITS Provide input: service area/department representatives	Implementation proceeds following a successful business case
D6	Develop and implement a standards-compliant image management program		Program Manager Records Specialist ITS Provide input: service area/department representatives; Legal	Program developed and implemented

5.3 RIM Strategy Implementation Timeline

This section provides a high-level timeline for the prioritized and phased implementation of the RIM strategy (Figure 31). It assumes that a RIM Specialist will be hired and that the City will secure additional resources to provide additional expertise and capacity if/as required. **The proposed timeline cannot be met if a RIM Specialist is not hired and if additional resources are not secured when needed (e.g. an Archivist to develop the archives strategy).**

The timeline illustrates durations, some of which will be elapsed.

Some activities will be completed on an ongoing basis. For example:

- While some policy development work will occur early in the timeline, other policies will be developed in later years as additional areas of RIM work are completed as in the case of the Archives Policy which would be prepared after the archives strategy has been completed.
- Activities such as promoting the use of the *Records Retention By-law* will be ongoing.
- Once a policy, procedure, tool, or technology has been implemented, its use and administration will be ongoing.

Figure 31 – RIM Strategy Implementation Timeline

Year Column Legend

- X = develop
- X = implement (implementation would continue thereafter)
- X = review (or test, in the case of the disaster recovery plan)

Objective #	Objective	Dependency (if any)	Year					
			1	2	3	4	5	6 +
A1.1	Establish an Information Governance Committee (IGC)		X					
A1.2	Establish a new steering committee (a RIM/Privacy Steering Committee) and continue the existing IT Steering Committees		X					
A1.3	Establish a Corporate RIM/Privacy Liaison Group		X					
A1.4	Continue RIM responsibility under the City Clerk		X					
A1.5	Formally assign archival records responsibility to the City Clerk		X					
A2.1	Develop and implement a RIM policy		X X	X				
A2.2	Finalize and implement the draft recordkeeping policies	A2.1	X X	X				
A2.3	Develop and implement additional recordkeeping policies	A2.1	X X	X X	X X			
A2.4	Review the RIM-related policies, revise them if/as required to (fully) address RIM implications, and implement the revised policies		X	X X	X			
A2.5	Review RIM/recordkeeping and RIM-related policies every two years, revise them if/as required, and implement the revised policies	A2.1 A2.2 A2.3 A2.4			X	X	X	X
A3.1	Establish a RIM Specialist position		X					
A3.2	Use internships, co-op placements, practicums, temporary employment contracts and/or engage		X	X	X	X	X	X

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Objective #	Objective	Dependency (if any)	Year						
			1	2	3	4	5	6 +	
	consultants to provide the additional skill sets and/or capacity required to support corporate RIM program development and implementation								
A3.3	Develop and implement a plan to provide additional resources every four years to offset the time the Program Manager, Information, Privacy and Elections will spend co-ordinating the municipal election event			X	X	X			
A4.1	Develop, implement, and periodically review measures to audit compliance with the RIM/ recordkeeping policies	A2.1 A2.2 A2.3	X X X	X X X	X X X	X X X	X X X	X X X	X X X
A4.2	Develop, implement, and periodically review measures to audit compliance with the RIM aspects of other City policies	A2.4	X X	X X	X X			X X	
B1.1	Review business processes to ensure all necessary records are being created, that they contain the necessary information, and that records are not being created unnecessarily			X	X				
B1.2	Determine the format in which records should be captured and implement those decisions	B1.1		X	X X	X			
B2.1	Review and assess information retrieval in Ernie/Infonet and implement improvements			X	X				
B2.2	Assess the feasibility of creating a central electronic repository to store documents/records of interest, use, and/or benefit to all employees and implement the repository if feasible	B2.1		X	X X	X			
B2.3	Develop and implement a function-based records classification scheme		X X	X X					
B2.4	Develop and implement conventions for naming electronic files		X X	X X					
B3.1	Promote the use of the City's existing electronic collaboration resources		X						
B3.2	Explore the feasibility of introducing enhanced collaboration spaces and implement those spaces if feasible	B3.1		X	X				
B4.1	Investigate, recommend, and implement the location(s) in which inactive paper records will be stored in the future			X X					
B4.2	Provide the necessary infrastructure (policy/procedures, technology, and training) before implementing any e-mail mailbox or file share storage quotas/limits		X						
B4.3	Assess the adequacy of the RIM and privacy protection provisions in cloud applications and renegotiate those provisions to ensure the implementation of best practices if/where applicable			X					
B4.4	Plan and implement paper and electronic records clean-up projects		X	X					

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Objective #	Objective	Dependency (if any)	Year					
			1	2	3	4	5	6 +
			X	X				
B5.1	Develop and implement an information security classification				X			
B5.2	Review and provide secure information destruction at all City facilities		X					
B5.3	Transfer funding for the shredding of paper records to the City Clerk's Office		X					
B5.4	Develop and implement a vital records program				X	X		
B5.5	Immediately stop loaning original by-laws		X					
B5.6	Develop, implement, and periodically test a comprehensive disaster recovery plan		X	X	X		X	
B5.7	Develop and implement short-term retention periods for network data back-ups		X					
B6.1	Develop and implement a new <i>Records Retention By-law</i>	B2.3	X	X				
B6.2	Implement an annual review and amendment of the <i>Records Retention By-law</i>		X					
B6.3	Promote greater compliance with the <i>Records Retention By-law</i>		X					
B6.4	Investigate the capability of corporate applications to apply retention rules and implement the rules as soon as it is feasible.				X	X		
B6.5	Clarify the 'records hold' terminology and develop a formal process for placing and removing records holds		X					
B6.6	Promote greater compliance with the records disposition process		X					
B7.1	Identify, preserve, and make archival records accessible (includes the development of an archives strategy)				X	X		
B7.2	Develop and implement a digital preservation strategy					X	X	
C1	Develop and implement a RIM communications strategy		X	X				
C2	Develop and regularly provide RIM training	Various (e.g. cannot train on RIM policy without having	X	X	X	X	X	
			X	X	X	X	X	

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Objective #	Objective	Dependency (if any)	Year					
			1	2	3	4	5	6 +
		completed A2.1)						
D1	Manage information/records on the public website according to RIM best practices				X			
D2	Manage information/records in social media content according to RIM best practices				X			
D3	Proactively identify the RIM implications of future technologies and manage those technologies according to RIM best practices			X	X	X	X	X
D4	Consider RIM principles when purchasing new software		X	X	X	X	X	X
D5	Implement a more robust ECM (enterprise content management) system to replace the EDMS and benefit from the expanded functionality of ECM technology					X	X	X
D6	Develop and implement a standards-compliant image management program				X	X		

5.4 RIM Strategy Implementation Costs

Staff time comprises a significant, but unquantifiable, cost for implementing many of the objectives in the RIM Strategy. In some cases, employees will be asked to do something new (e.g. attend RIM training, perform record clean-ups, etc.). In other cases, they will be asked to do an existing task in a different way (e.g. file an electronic record in the corporate classification structure instead of their own *ad hoc* structure). No monetary compensation is anticipated for the performance of any new tasks. The allocation of employee time to new tasks or from inefficient, *ad hoc* RIM efforts to deliberate, targeted, and corporate RIM initiatives should increase overall productivity.

Figure 32 lists the estimated costs required to purchase the resources required to implement the RIM Strategy. The costs are based on the following assumptions:

1. The hiring of a full-time RIM Specialist is crucial for completing many of the objectives. The estimated costs include the annual salary and compensation for that position. Implementation costs would be significantly higher if RIM specialists (i.e. consultants or other service providers) were retained to complete the work that would be assigned to the RIM Specialist.
2. Estimated fees are included for an Archivist Consultant to prepare the archives strategy on the assumption that neither the Program Manager, Information, Privacy and Elections nor the RIM Specialist (to be hired) possess professional qualifications in archives.
3. Compensation for co-op students, interns, practicum students, or temporary employees cannot be estimated until requirements for such assistance (if any) have been determined.
4. It is anticipated that existing administration budgets will fund office and meeting space, telecommunications, and printing (e.g. RIM training materials) expenses. Therefore, no amounts have been estimated for those expenses.
5. Several objectives require the City to complete a detailed analysis of options (e.g. future inactive paper records storage, management of archival records, etc.) prior to deciding how to proceed. When working on such objectives, a detailed business case will be prepared to outline the anticipated start-up and ongoing administration costs of the viable options. Therefore, no amounts have been estimated for those objectives.

Figure 32 – Summary of Estimated Implementation Costs

Objective #	Objective	Estimated Cost
A1.1	Establish an Information Governance Committee (IGC)	Staff time
A1.2	Establish a new steering committee (a RIM/ Privacy Steering Committee) and continue the existing IT Steering Committees	Staff time
A1.3	Establish a Corporate RIM/Privacy Liaison Group	Staff time
A1.4	Continue RIM responsibility under the City Clerk	Staff time
A1.5	Formally assign archival records responsibility to the City Clerk	Staff time
A2.1	Develop and implement a RIM policy	Staff time
A2.2	Finalize and implement the draft recordkeeping policies	Staff time
A2.3	Develop and implement additional recordkeeping policies	Staff time
A2.4	Review the RIM-related policies, revise them if/as required to (fully) address RIM implications, and implement the revised policies	Staff time
A2.5	Review RIM/recordkeeping and RIM-related policies every two years, revise them if/as required, and implement the revised policies	Staff time
A3.1	Establish a RIM Specialist position	\$66,000 - \$82,000/year + benefits Professional development \$400 USD/year ¹⁰⁸ Conferences \$3,000/year
A3.2	Use internships, co-op placements, practicums, temporary employment contracts and/or engage consultants to provide the additional skill sets and/or capacity required to support corporate RIM program development and implementation	TBD – Cost for interns, co-op placements, or temporary employment contracts will depend on the duration of the projects/work to be performed TBD – Cost for consultants will depend on the scope of work
A3.3	Develop and implement a plan to provide additional resources every four years to offset	Staff time

¹⁰⁸ Professional development includes: \$175 USD ARMA International professional membership and \$195 USD AIIM professional membership.

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Objective #	Objective	Estimated Cost
	the time the Program Manager, Information, Privacy and Elections will spend co-ordinating the municipal election event	
A4.1	Develop, implement, and periodically review measures to audit compliance with the RIM/recordkeeping policies	Staff time TBD – Cost for consultants (if any) will depend on the scope of work
A4.2	Develop, implement, and periodically review measures to audit compliance with the RIM aspects of other City policies	Staff time TBD – Cost for consultants (if any) will depend on the scope of work
B1.1	Review business processes to ensure all necessary records are being created, that they contain the necessary information, and that records are not being created unnecessarily	Staff time
B1.2	Determine the format in which records should be captured and implement those decisions	Staff time TBD – Cost (if any) to purchase and implement new/upgraded technology for capturing records
B2.1	Review and assess information retrieval in Ernie/Infonet and implement improvements	Staff time TBD – Cost to implement improvements will depend on the nature of the improvements to be made and whether new/different technology is required
B2.2	Assess the feasibility of creating a central electronic repository to store documents/records of interest, use, and/or benefit to all employees and implement the repository if feasible	Staff time TBD – Cost to implement any such repository will depend on the whether new/different technology is required
B2.3	Develop and implement a function-based records classification scheme	Staff time
B2.4	Develop and implement conventions for naming electronic files	Staff time
B3.1	Promote the use of the City's existing electronic collaboration resources	Staff time TBD – Cost to implement any such spaces will depend on the technology required
B3.2	Explore the feasibility of introducing enhanced collaboration spaces and implement those spaces if feasible	Staff time TBD – Cost to implement will depend on the storage location(s) selected
B4.1	Investigate, recommend, and implement the location(s) in which inactive paper records will be stored in the future	Staff time TBD – Cost to outsource storage to a commercial record centre (if any) will depend on volume TBD – Cost to create/upgrade space at one or more City facilities for secure inactive paper records storage will depend on records

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Objective #	Objective	Estimated Cost
		volume and the condition of existing space(s)
B4.2	Provide the necessary infrastructure (policy/procedures, technology, and training) before implementing any e-mail mailbox or file share storage quotas/limits	Staff time TBD – Cost to provide a secure, auditable repository for e-mails would be included in the ECM system cost (see objective # D5)
B4.3	Assess the adequacy of the RIM and privacy protection provisions in cloud applications and renegotiate those provisions to ensure the implementation of best practices if/where applicable	Staff time
B4.4	Plan and implement paper and electronic records clean-up projects	Staff time TBD – Cost to shred paper records that have met/exceeded their scheduled disposition date will depend on volume
B5.1	Develop and implement an information security classification	Staff time
B5.2	Review and provide secure information destruction at all City facilities	Staff time TBD – Cost to implement will depend on the availability and capacity of existing measures for secure information destruction at City facilities other than City Hall
B5.3	Develop and implement a vital records program	Staff time TBD – Cost to protect vital records will depend on the volume of records to be protected and the protection method(s) selected
B5.4	Immediately stop loaning original by-laws	Staff time
B5.5	Develop, implement, and periodically test a comprehensive disaster recovery plan	Staff time
B5.6	Develop and implement short-term retention periods for network data back-ups	Staff time TBD – Cost to purchase back-up tapes and store them will depend on volume which will in turn depend on the duration of the retention periods that have been approved <i>Note: The implementation of this recommendation should result in cost-savings. The City currently spends \$64,000 (approx.) on back-up tapes (tapes, cleaning, and data writing) and the off-site storage and retrieval of those tapes.</i>
B6.1	Implement an annual review and amendment of the <i>Records Retention By-law</i>	Staff time
B6.2	Promote greater compliance with the <i>Records Retention By-law</i>	Staff time

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Objective #	Objective	Estimated Cost
		TBD – Cost to develop (or purchase) posters, provide incentives for ‘retention and disposition days’, etc. depends on the promotion strategy that will be developed
B6.3	Investigate the capability of corporate applications to apply retention rules and implement the rules as soon as it is feasible.	Staff time TBD – Cost to implement retention rules will depend on the whether technology modifications/add-ons are required
B6.4	Clarify the ‘records hold’ terminology and develop a formal process for placing and removing records holds	Staff time
B6.5	Promote greater compliance with the records disposition process	Staff time TBD – Cost to develop (or purchase) posters, provide incentives for ‘retention and disposition days’, etc. depends on the promotion strategy that will be developed
B7.1	Identify, preserve, and make archival records accessible	\$12,000 - \$15,000 for an Archival Consultant to develop the archives strategy TBD – Cost to implement the strategy will depend on the archives option selected (i.e. loan/donate archival records to an existing archives or develop an in-house archives)
B7.2	Develop and implement a digital preservation strategy	Staff time TBD – Cost to develop the strategy (e.g. hardware, software, electronic storage media, conversion services, etc.) cannot be estimated until the plan has been developed and approved
C1	Develop and implement a RIM communications strategy	Staff time TBD – Cost to implement the strategy cannot be estimated until the strategy has been developed and approved
C2	Develop and regularly provide RIM training	Staff time TBD – Cost to prepare webinars/podcasts if that training delivery method will be used
D1	Manage information/records on the public website according to RIM best practices	Staff time TBD – Cost to implement a strategy to capture and manage website records cannot be estimated until the strategy has been developed and approved
D2	Manage information/records in social media	Staff time

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Objective #	Objective	Estimated Cost
	content according to RIM best practices	TBD – Costs to implement a strategy to capture and manage social media records cannot be estimated until the strategy has been developed and approved
D3	Proactively identify the RIM implications of future technologies and manage those technologies according to RIM best practices	Staff time
D4	Consider RIM principles when purchasing new software	Staff time TBD – Cost to implement will depend on factors such as whether a vendor charges a premium for more robust software (i.e. software that addresses RIM) or the cost to add RIM functionality to a system
D5	Implement a more robust ECM (enterprise content management) system to replace the EDMS and benefit from the expanded functionality of ECM technology	Staff time TBD – Cost to engage a consultant to complete the ECM requirements analysis and, potentially, participate as a non-voting advisor in the ECM procurement process TBD – Cost to hire an ECM Project Manager will depend on the duration of the project and the prevailing marketplace rates at the time of implementation TBD – Cost to purchase, implement, and maintain the ECM will depend on the outcome of a competitive procurement process. (the City may find the following estimates helpful: <ul style="list-style-type: none"> a) \$300-\$2,000 per seat/license purchase cost b) \$200,000 - \$300,000 for professional services during implementation (excluding Project Manager) c) 18-23% of purchase cost for annual software maintenance fees d) TBD cost of new/upgraded computer equipment such as servers)
D6	Develop and implement a standards-compliant image management program	\$300 to purchase the CGSB standards for electronic records as documentary evidence ¹⁰⁹

¹⁰⁹ Canadian General Standards Board standard: *Microfilm and Electronic Images as Documentary Evidence* (CAN/CGSB-72.11-93). It is also recommended that the City purchase the CGSB standard for born digital records, *Electronic Records as Documentary Evidence* (CAN/CGSB- 72.34-2005).

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Objective #	Objective	Estimated Cost
		TBD – Cost to purchase new/upgraded scanners will depend on the approved program

Appendix 1: Supporting Information (delivered under separate cover)

Below are the tables of contents from the two volume *RIM Strategy Current Environment Assessment* on which the RIM Strategy is based.

RIM Strategy Current Environment Assessment: Volume 1 – Findings Report

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Characteristics of a Record.....	Error! Bookmark not defined.
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RIM Strategy Current Environment Assessment: Volume 2 – Survey Reports

1. Comparator Municipalities RIM Survey Summary Report
2. City of Guelph Employee RIM Survey Report

Appendix 2: Characteristics of a Record

The ISO 15489-1 records management standard defines the characteristics of any record regardless of its format or storage media. Those characteristics are authenticity, reliability, integrity, and usability. In addition, a record has three parts/elements (content, context, and structure) which are also described below.

The standard requires a record to “correctly reflect what was communicated or decided or what action was taken.”¹¹⁰ Further, a record should be able to “support the needs of the business to which it relates and be used for accountability purposes.”¹¹¹

The standard also states that an organization’s “Records management policies, procedures and practices should lead to authoritative records”.¹¹² An **authentic** record is a record that can be proven:

- a) to be what it purports to be,
- b) to have been created or sent by the person purported to have created or sent it, and
- c) to have been created or sent at the time purported.

To ensure the authenticity of records, the standard states that “organizations should implement and document policies and procedures which control the creation, receipt, transmission, maintenance and disposition of records to ensure that records creators are authorized and identified and that records are protected against unauthorized addition, deletion, alteration, use and concealment.”¹¹³

A record is considered **reliable** if its “contents can be trusted as a full and accurate representation of the transactions, activities or facts to which they attest and can be depended upon in the course of subsequent transactions or activities.”¹¹⁴ Consequently, records should be created contemporaneously (i.e. at the time of the transaction or incident to which they relate) or as soon as possible afterwards, and “by individuals who have direct knowledge of the facts or by instruments routinely used within the business to conduct the transaction.”¹¹⁵

Integrity refers to a record being complete and unaltered. To ensure integrity, a record must be protected from unauthorized alteration. Consequently, “Records management policies and procedures should specify what additions or annotations may be made to a record after it is created, under what circumstances additions or annotations may be authorized, and who is

¹¹⁰ International Organization for Standardization (ISO), *Information and documentation – Records management- Part 1: General, ISO 15489-1:2001*, s. 7.2.1.

¹¹¹ *Ibid.*

¹¹² *Ibid.*

¹¹³ *Ibid.*, s. 7.2.2.

¹¹⁴ *Ibid.*, s. 7.2.3.

¹¹⁵ *Ibid.*, s. 7.2.3.

authorized to make them. Any authorized annotation, addition or deletion to a record should be explicitly indicated and traceable.”¹¹⁶

A **useable** record can be located, retrieved, presented, and interpreted. Further, “It should be capable of subsequent presentation as directly connected to the business activity or transaction that produced it.”¹¹⁷ Consequently, a record’s contextual linkages should carry the information needed to understand the transaction(s) that created and used the record.

In addition, a record has three parts/elements: content, context, and structure.

- a) **Content:** “The intellectual substance of a document, including text, data, symbols, numerals, images, and sound.”¹¹⁸ Essentially, content is the facts about the activity, transaction, person, subject, place, etc. in the record.

- b) **Context:** “The organizational, functional, and operational circumstances surrounding materials’ creation, receipt, storage, or use, and its relationship to other materials.”¹¹⁹ Records cannot be fully understood without adequate knowledge of the activity that gave rise to them, the wider function of which that activity forms part, and the administrative context of the activity including the identities and roles of the various participants. Contextual information must be captured in the records themselves or in the systems used to maintain them (e.g. metadata).

- c) **Structure:** “The manner in which elements are organized, interrelated, and displayed.”¹²⁰ Records must reflect the relationships between their constituent parts. For example, in a letter there is a formal structural relationship between the details of the addressee, the date, the body of the text divided into paragraphs, and the signature at the end.

¹¹⁶ International Organization for Standardization (ISO), *Information and documentation – Records management- Part 1: General, ISO 15489-1:2001*, s. 7.2.4.

¹¹⁷ *Ibid.*, s. 7.2.5.

¹¹⁸ Pearce-Moses, Richard, *A Glossary of Archival and Records Management Terminology*, 2005

<http://files.archivists.org/pubs/free/SAA-Glossary-2005.pdf>

¹¹⁹ *Ibid.*

¹²⁰ *Ibid.*

Appendix 3: Information Governance Maturity Model Benchmarking

This appendix contains Ergo's assessment of the City's current RIM environment using the Information Governance Maturity Model benchmarking tool as excerpted from Appendix 5 in the *RIM Strategy Current Environment Assessment: Volume 1 – Findings Report*.

Note:

1. References in the Maturity Model to 'records and information management' and 'records management' were abbreviated as 'RIM'.
2. References to 'information governance program' were abbreviated as 'IG program'.
3. References to 'information governance' were abbreviated as 'IG'.

Figure 33 – Benchmarking the City Using the Information Governance Maturity Model

The Principle, and the City's Current and Proposed Levels	Level 1 (Sub-Standard)	Level 2 (In Development)
<p>Accountability: A senior executive (or person of comparable authority) shall oversee the IG program and delegate responsibility for RIM to appropriate individuals. The organization adopts policies and procedures to guide personnel and ensure that the program can be audited.</p> <p>Ergo's Ratings Current Level: 2 Target Level: 3</p> <ul style="list-style-type: none"> - Management level RIM responsibility assigned to City Clerk and RIM responsibility delegated to Program Manager, Information, Privacy and Elections (formerly the Records and Information Specialist) - Some RIM policies/procedures (many draft) - No auditing of RIM compliance - Some <i>ad hoc</i> RIM practices - Management aware of the need to better manage information assets 	<p>No senior executive (or person of comparable authority) is responsible for records or information.</p> <p>The records manager role is largely non-existent, or it is an administrative and/or clerical role distributed among general staff.</p> <p>Information assets are managed in a disparate fashion or not at all.</p>	<p>No senior executive (or person of comparable authority) is involved in or responsible for records or information.</p> <p>The records manager role is recognized, although the person in that role is responsible only for tactical operation of the existing RIM program, which is concerned primarily with managing records rather than all information assets.</p> <p>In many cases, the existing RIM program covers paper records only.</p> <p>The information technology function or department is the <i>de facto</i> lead for storing electronic information, and the records manager is not involved in discussions about electronic systems. Information is not stored in a systematic fashion.</p> <p>The organization is aware that it needs to govern its broader information assets.</p>
Level 3 (Essential)	Level 4 (Proactive)	Level 5 (Transformational)
<p>The records manager role is recognized, and the person in that role is responsible for the tactical operation of the established RIM program on an organization-wide basis. Electronic records are part of the RIM program.</p> <p>The records manager is actively engaged in strategic information and RIM initiatives with other officers of the organization.</p> <p>Senior management is aware of the RIM program.</p> <p>The organization envisions establishing a broader-based IG program to direct various information-driven processes throughout the enterprise.</p> <p>The organization has defined specific goals related to accountability.</p>	<p>The organization has appointed an information governance professional, who also oversees the RIM program.</p> <p>The records manager is a senior officer responsible for all tactical and strategic aspects of the RIM program, which is an element of an IG program.</p> <p>A stakeholder committee representing all functional areas meets on a periodic basis to review disposition policy and other RIM-related issues.</p>	<p>The organization's senior management and its governing board place great emphasis on the importance of IG.</p> <p>The records manager directs the RIM program and reports to an individual in the senior level of management (e.g. chief information governance officer).</p> <p>The chief information governance officer and the records manager are essential members of the organization's governing body.</p> <p>The organization's initial goals related to accountability have been met, and it has an established process to ensure its goals for accountability are routinely reviewed and revised.</p>

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The Principle, and the City's Current and Proposed Levels	Level 1 (Sub-Standard)	Level 2 (In Development)
<p>Transparency: An organization's business processes and activities, including its IG program, shall be documented in an open and verifiable manner, and the documentation shall be available to all personnel and appropriate interested parties.</p> <p><u>Ergo's Ratings</u></p> <p>Current Level: 2 Target Level: 3</p> <ul style="list-style-type: none"> - The City has begun to document its RIM processes (many draft) - Intranet site for RIM policies/procedures - Some challenges in accommodating requests for information (FOI) due to multiplicity of storage locations and time constraints 	<p>It is difficult to obtain timely information about the organization, its business, or its RIM program.</p> <p>Business and RIM processes are not well-defined, and no clear documentation regarding these processes is readily available.</p> <p>There is no emphasis on transparency.</p> <p>The organization cannot readily accommodate requests for information, discovery for litigation, regulatory response, freedom of information, or other requests (e.g. from potential business partners, investors or buyers).</p> <p>The organization has not established controls to ensure the consistency of information disclosure.</p>	<p>The organization realizes that some degree of transparency is important in its business processes and RIM program for business or regulatory needs.</p> <p>Although a limited amount of transparency exists in areas where regulations demand it, there is no systematic or organization-wide drive to transparency.</p> <p>The organization has begun to document its business and RIM processes.</p>
Level 3 (Essential)	Level 4 (Proactive)	Level 5 (Transformational)
<p>Transparency in business and RIM is taken seriously, and information is readily and systematically available when needed.</p> <p>There is a written policy regarding transparency in business and RIM.</p> <p>Employees are educated on the importance of transparency and the specifics of the organization's commitment to transparency.</p> <p>The organization has defined specific goals related to information governance transparency.</p> <p>Business and RIM processes are documented. The organization can accommodate most requests for information, discovery for litigation, regulatory responses, freedom of information, or other requests (e.g. from potential business partners, investors, or buyers).</p>	<p>Transparency is an essential part of the corporate culture and is emphasized in training.</p> <p>The organization monitors compliance on a regular basis.</p> <p>Business and RIM process documentation is monitored and updated consistency.</p> <p>Requests for information, discovery for litigation, regulatory responses, freedom of information, or other requests (e.g. from potential business partners, investors, or buyers) are managed through routine business processes.</p>	<p>The organization's senior management considers transparency as a key component to information governance.</p> <p>The software tools that are in place assist in transparency.</p> <p>Requestors, courts, and other legitimately interested parties are consistency satisfied with the transparency of the processes and the organization's responses.</p> <p>The organization's initial goals related to transparency have been met, and it has an established process to ensure its goals for transparency are routinely reviewed and revised.</p>

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The Principle, and the City's Current and Proposed Levels	Level 1 (Sub-Standard)	Level 2 (In Development)
<p>Integrity: An IG program shall be constructed so the information generated by or managed for the organization has a reasonable and suitable guarantee of authenticity and reliability.</p> <p>Ergo's Ratings Current Level: 1 Target Level: 3</p> <ul style="list-style-type: none"> - No systematic audits or defined processes for showing the authenticity of a record or information - Trustworthiness cannot easily be guaranteed 	<p>There are no systematic audits or defined processes for showing the authenticity of a record or information, meaning that its origin, time of creation or transmission, and content are what they are purported to be.</p> <p>Various organization functions use <i>ad hoc</i> methods to demonstrate authenticity and chain of custody, as appropriate, but their trustworthiness cannot easily be guaranteed.</p>	<p>Some organizational records and information are stored with their respective metadata that demonstrate authenticity; however, no formal process is defined for metadata storage and chain of custody.</p> <p>Metadata storage and chain of custody methods are acknowledged to be important, but they are left to the different departments to handle as they determine is appropriate.</p>
Level 3 (Essential)	Level 4 (Proactive)	Level 5 (Transformational)
<p>The organization has a formal process to ensure that the required level of authenticity and chain of custody can be applied to its systems and processes.</p> <p>Appropriate data elements to demonstrate compliance with the policy are captured.</p> <p>The organization has defined specific goals related to integrity.</p>	<p>There is a clear definition of metadata requirements for all systems, business applications, and records that are needed to ensure the authenticity of records and information.</p> <p>Metadata requirements include security and signature requirements and chain of custody as needed to demonstrate authenticity.</p> <p>The metadata definition process is an integral part of the records management practice in the organization.</p>	<p>There is a formal, defined process for introducing new record-generating systems, capturing their metadata, and meeting other authenticity requirements, including chain of custody.</p> <p>Integrity controls of records and information are reliably and systematically audited.</p> <p>The organization's initial goals related to integrity have been met, and it has an established process to ensure its goals for integrity are routinely reviewed and revised.</p>

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The Principle, and the City's Current and Proposed Levels	Level 1 (Sub-Standard)	Level 2 (In Development)
<p>Protection: An IG program shall be constructed to ensure a reasonable level of protection to records and information that are private, confidential, privileged, secret, classified, essential to business continuity, or that otherwise require protection.</p> <p>Ergo's Ratings Current Level: 1.5 Target Level: 3</p> <ul style="list-style-type: none"> - Written policy (draft) re: privacy/personal information - Some guidance for protecting confidential information - Access controls, if any, are assigned by the author - No vital records program 	<p>No consideration is given to information protection.</p> <p>Records and information are stored haphazardly, with protection taken by various groups and departments and with no centralized access controls.</p> <p>Access controls, if any, are assigned by the author.</p>	<p>Some protection of information assets is exercised.</p> <p>There is a written policy for records and information that require a level of protection (e.g. personnel records). However, the policy does not give clear and definitive guidelines for all information in all media types.</p> <p>Guidance for employees is not universal or uniform. Employee training is not formalized.</p> <p>The policy does not address how to exchange these records and information among internal or external stakeholders.</p> <p>Access controls re implemented by individual content owners.</p>
Level 3 (Essential)	Level 4 (Proactive)	Level 5 (Transformational)
<p>The organization has a formal written policy for protecting records and information, as well as centralized access controls.</p> <p>Confidentiality and privacy considerations are well-defined within the organization.</p> <p>The importance of chain of custody is defined, when appropriate.</p> <p>Training for employees is available.</p> <p>Records and information audits are conducted only in regulated areas of the business. Audits in other areas may be conducted, but they are left to the discretion of each functional area.</p> <p>The organization has defined specific goals related to records and information protection.</p>	<p>The organization has implemented systems that provide for the protection of the information.</p> <p>Employee training is formalized and well-documented.</p> <p>Auditing of compliance and protection is conducted on a regular basis.</p>	<p>Executives and/or senior management and other governing bodies (e.g. board of directors) place great value in the protection of information.</p> <p>Audit information is regularly examined, and continuous improvement is undertaken.</p> <p>Inappropriate or inadvertent information disclosure or loss incidents are rare.</p> <p>The organization's initial goals related to protection have been met, and it has an established process to ensure its goals for protection are routinely reviewed and revised.</p>

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The Principle, and the City's Current and Proposed Levels	Level 1 (Sub-Standard)	Level 2 (In Development)
<p>Compliance: An IG program shall be constructed to comply with applicable laws and other binding authorities, as well as with the organization's policies.</p> <p>Ergo's Ratings Current Level: 2 Target Level: 3</p> <ul style="list-style-type: none"> - No records classification resulting in <i>ad hoc</i> practices - Little file naming or version control standardization - <i>Records Retention By-law</i> lists records to be kept - No measurement of RIM compliance - Legal hold process developed - Many policies in draft form 	<p>There is no clear understanding or definition of the information or records the organization is obligated to keep.</p> <p>Information is not systematically managed. Groups and units within the organization manage information as they see fit based upon their own understanding of their responsibilities, duties, and what the appropriate requirements are.</p> <p>There is no central oversight or guidance and no consistently defensible position on information governance.</p> <p>There is no formally defined or generally understood process for imposing legal, audit, or other information production processes.</p> <p>The organization has significant exposure to adverse consequences from poor compliance practices.</p>	<p>The organization has identified some of the rules and regulations that govern its business and introduced some compliance policies and good information management practices around those policies. Policies are not complete, and there are no structured accountability processes or controls for compliance.</p> <p>There is a hold process, but it is not well-integrated with the organization's information management and discovery processes, and the organization does not have full confidence in it.</p>
Level 3 (Essential)	Level 4 (Proactive)	Level 5 (Transformational)
<p>The organization has identified key compliance laws and regulations.</p> <p>Information creation and capture are in most cases systematically carried out in accordance with information management principles.</p> <p>The organization has a code of business conduct that is integrated into its overall information governance structure and policies.</p> <p>Compliance is highly valued and measurable, and suitable records and information demonstrating the organization's compliance are maintained.</p> <p>The hold process is integrated into the organization's information management and discovery processes for the critical systems, and it is generally effective.</p> <p>The organization has implemented specific goals related to compliance.</p> <p>The organization's exposure to adverse consequences from poor information management and governance practices is reduced.</p>	<p>The organization has implemented systems to capture and protect information for all key repositories and systems.</p> <p>Records are linked with the metadata used to demonstrate and measure compliance.</p> <p>Employees are trained appropriately, and audits are conducted regularly.</p> <p>Lack of compliance is consistently remedied through implementation of defined corrective actions.</p> <p>Records of audits and training are available for review.</p> <p>The legal, audit, and information production processes are well-managed and effective, with defined roles and repeatable processes that are integrated into the organization's information governance program.</p> <p>The organization is at low risk of adverse consequences from poor information management and governance practices.</p>	<p>The importance of compliance and the role of records and information in it are clearly recognized at the senior management and governing body levels (e.g. board of directors).</p> <p>Auditing and continuous improvement processes are well-established and monitored by senior management.</p> <p>The roles and processes for information management and discovery are integrated, and those processes are well-developed and effective.</p> <p>The organization suffers few or no adverse consequences based on information governance and compliance failures.</p> <p>The organization's initial goals related to compliance have been met, and it has an established process to ensure its goals for compliance are routinely reviewed and revised.</p>

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The Principle, and the City's Current and Proposed Levels	Level 1 (Sub-Standard)	Level 2 (In Development)
<p>Availability: An organization shall maintain records and information in a manner that ensure timely, efficient, and accurate retrieval of needed information.</p> <p>Ergo's Ratings Current Level: 2 Target Level: 3</p> <ul style="list-style-type: none"> - Some challenges prevent the timely, efficient retrieval of information - Lack of version control and information finding aids - Information request (FOI) processing sometimes challenging because it is not clear where information resides - Differentiation of official records, duplicates, and non-record information may not be widely understood - Storage standards not imposed across the organization 	<p>Records and other information are not readily available when needed, and/or it is unclear who to ask when there is a need for it to be produced.</p> <p>It takes time to find the correct version, the signed version, or the final version of information, if it can be found at all.</p> <p>The records and other information lack finding aids, such as various indices, metadata, and other methodologies.</p> <p>Legal discovery and information requests are difficult because it is not clear where information resides or where the final copy is located.</p>	<p>Records and information retrieval mechanisms have been implemented in some parts of the organization.</p> <p>In those areas with retrieval mechanisms, it is possible to distinguish among official records, duplicates, and non-record information.</p> <p>There are some policies on where and how to store official records and information, but a standard is not imposed across the organization.</p> <p>Responding to legal discovery and information requests is complicated and costly due to the inconsistent treatment of information.</p>
Level 3 (Essential)	Level 4 (Proactive)	Level 5 (Transformational)
<p>There is a standard for where and how records and information are stored, protected, and made available.</p> <p>There are clearly defined policies regarding the handling of records and information.</p> <p>Records and information retrieval mechanisms are consistent and contribute to timely retrieval. Most of the time, it is easy to determine where to find the authentic and final version of any information.</p> <p>Legal discovery and information request processes are well-defined and systematic.</p> <p>Systems and infrastructure contribute to the availability of records and information.</p> <p>The organization has defined specific goals related to availability of records and information.</p>	<p>Information governance policies have been clearly communicated to all employees and other parties.</p> <p>There are clear guidelines and an inventory that identify and define the systems and their information assets. Records and information are consistently and readily available when needed.</p> <p>Appropriate systems and controls are in place for legal discovery and information requests. Automation is adopted to facilitate the consistent implementation of the hold and information request processes.</p>	<p>The senior management and governing body (e.g. board of directors) provide support to continually upgrade the processes that affect records and information availability.</p> <p>There is an organized training and continuous improvement across the organization.</p> <p>There is a measurable return on investment to the organization as result of records and information availability.</p> <p>The organization's initial goals related to availability have been met, and it has an established process to ensure its goals for availability are routinely reviewed and revised.</p>

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The Principle, and the City's Current and Proposed Levels	Level 1 (Sub-Standard)	Level 2 (In Development)
<p>Retention: An organization shall maintain its records and information for an appropriate time, taking into account its legal, regulatory, fiscal, operational, and historical requirements.</p> <p>Ergo's Ratings Current Level: 2 Target Level: 3</p> <ul style="list-style-type: none"> - <i>Records Retention By-law</i> available but may not be well known or used, particularly for electronic records - 2014 <i>Records Retention By-law</i> amendment the first since 2008 - Retention and disposition training not provided - Records Destruction Forms not completed for electronic records contrary to policy 	<p>There is no current, documented records retention schedule or policy.</p> <p>Rules and regulations that should define retention are not identified or centralized. Retention guidelines are haphazard, at best.</p> <p>In the absence of retention schedules and policies, employees either keep everything or dispose of records and information based on their own business needs, rather than organizational needs.</p>	<p>A retention schedule and policies are available, but they do not encompass all records and information, did not go through an official review, and are not well known around the organization.</p> <p>The retention schedule and polices are not regularly updated or maintained.</p> <p>Education and training about the retention policies are not available.</p>
Level 3 (Essential)	Level 4 (Proactive)	Level 5 (Transformational)
<p>The organization has instituted a policy for records and information retention. A formal retention schedule that is tied to rules and regulations is consistently applied throughout the organization.</p> <p>The organization's employees are knowledgeable about the retention policy, and they understand their personal responsibilities for records and information retention.</p> <p>The organization has defined specific goals related to retention.</p>	<p>Employees understand how to classify record and information appropriately.</p> <p>Retention training is in place.</p> <p>Retention schedules are reviewed on a regular basis, and there is a process to adjust retention schedules, as needed.</p> <p>Records and information retention is a major organizational objective.</p>	<p>Retention is an important item at the senior management and governing body level (e.g. board of directors).</p> <p>Retention is looked at holistically and is applied to all information in an organization, not just to official records.</p> <p>Information is consistently retained for appropriate periods of time.</p> <p>The organization's initial goals related to retention have been meet, and it has an established process to ensure its goals for retention are routinely reviewed and revised.</p>

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The Principle, and the City's Current and Proposed Levels	Level 1 (Sub-Standard)	Level 2 (In Development)
<p>Disposition: An organization shall provide secure and appropriate disposition for records and information that are no longer required to be maintained by applicable laws and the organization's policies.</p> <p>Ergo's Ratings Current Level: 2 Target Level: 3</p> <ul style="list-style-type: none"> - Documentation of processes for records/information disposition; however, their use is limited to paper records - Some awareness of the importance of suspending disposition when required - No enforcement or auditing of disposition 	<p>There is no documentation of the processes (if there are any) used to guide the transfer or disposition of records and information.</p> <p>The process for suspending disposition in the event of investigation or litigation is non-existent or is inconsistent across the organization.</p>	<p>Preliminary guidelines for disposition are established.</p> <p>There is a realization of the importance of suspending disposition in a consistent manner, when required.</p> <p>There may not be enforcement and auditing of disposition.</p>
Level 3 (Essential)	Level 4 (Proactive)	Level 5 (Transformational)
<p>Official procedures for records and information disposition and transfer have been developed.</p> <p>Official policy and procedures for suspending disposition have been developed.</p> <p>Although policies and procedure exist, they may not be standardized across the organization.</p> <p>The organization has defined specific goals related to disposition.</p>	<p>Disposition procedures are understood by all and are consistently applied across the enterprise.</p> <p>The process for suspending disposition is defined, understood, and used consistently across the organization.</p> <p>Records and information in all media are disposed of in a manner appropriate to the information content and retention policies.</p>	<p>The disposition process covers all records and information in all media.</p> <p>Disposition is assisted by technology and is integrated into all applications, data warehouses, and repositories.</p> <p>Disposition processes are consistently applied and effective.</p> <p>Processes for disposition are regularly evaluated and improved.</p> <p>The organization's initial goals related to disposition have been met, and it has an established process to ensure its goals for disposition are routinely reviewed and revised.</p>

Appendix 4: RIM Specialist Position

This appendix provides a position summary, duties, and qualifications for this proposed full-time, non-union and, ideally permanent, position.

The appendix takes into consideration the position summary, duties, and qualifications in the 2015 job posting for the new Program Manager, Information, Privacy and Elections position. Items to be realigned in the Program Manager job posting have been flagged, as have items of necessary overlap between the two positions.

Position Summary

The RIM Specialist assists in the development, implementation, and maintenance of the Records and Information Management (RIM) program, and the delivery of access and privacy services and programs.

Duties – Records and Information Management

- Assists the Program Manager, Information, Privacy and Elections to develop, implement, and administer an effective organization-wide RIM program in accordance with policies, standards, best practices, and legislative requirements.
- Develops and maintains the corporate records classification scheme.
- Conducts periodic assessments and maintains an inventory of the City's information holdings. [it is proposed that this duty be transferred from the Program Manager position with the Program Manager instead providing 'oversight' of the periodic assessments conducted by the Specialist and 'oversight' of the Specialist's maintenance of an inventory of the City's information holdings]
- Reviews and updates the City's records retention schedule and annual records destruction program. [it is proposed that this duty be transferred from the Program Manager position with the Program Manager instead providing 'oversight' of the reviews and updates of the retention schedule and annual records destruction program]
- Coordinates the transfer and disposition of records to and from all departments/program areas in accordance with the retention schedule. [it is proposed that this duty be transferred from the Program Manager position with the Program Manager instead providing 'oversight' of the transfer and disposition of records]
- Assists the Program Manager to develop and implement policies, procedures and resources for the orientation and training of staff to support the RIM program.
- Analyze and develop recommendations for new/improved RIM practices.
- Conduct periodic reviews and formal audits of RIM compliance.

Duties – Access and Privacy Management

- Assists the Program Manager to process requests received under *MFIPPA*, including complaints and appeals.
- Assists the Program Manager to develop and maintain processes to ensure efficient and timely processing of access requests.
- Assist the Program Manager to develop and deliver an effective training to city staff on FOI procedures.
- Assist the Program Manager to develop policies and procedures related to *MFIPPA* and revise existing policies and procedures to ensure compliance.
- Assist the Program Manager to train and educate City staff to ensure compliance with the City's obligations under *MFIPPA* with respect to disclosure of information and protection of privacy.

Qualifications

- Minimum of 3 years in a similar role, preferably in a municipality/municipal sector organization.
- Completion of a post-secondary certificate in RIM and/or privacy.
- Knowledge of RIM best practices and standards, and Canadian (federal) and Province of Ontario legislation affecting the management of records.
- Knowledge of the *Municipal Freedom of Information and Protection of Privacy Act* and the *Personal Health Information Protection Act*.

Additional Qualifications

- Strong organizational skills with the ability to manage multiple tasks simultaneously. [a very similarly worded qualification is also in the Program Manager job positing]
- Excellent oral and written communications skills with the ability to communicate with all levels of staff, stakeholders and the general public. [this qualification is also in the Program Manager job positing]
- Proficiency in Microsoft Office.
- Experience with an EDMS/EDRMS/ECM system preferred.
- Ability to analyze problems, identify alternatives, and make recommendations in order to implement RIM improvements. [a similarly worded qualification is also in the Program Manager job positing]
- Ability to apply RIM policy, standards and best practices.
- Ability to perform the physical aspects of the position (e.g. bending, lifting and moving boxes of up to 20lbs). [this qualification is also in the Program Manager job positing]

Appendix 5: Sample RIM Performance Monitoring Tool

This appendix provides a sample of a RIM performance monitoring tool that could be modified to suit and support the City's specific needs.

A simple spreadsheet, this tool identifies all repositories wherein information and records are currently stored. The exact or approximate number of Information Resources (IRs, including all files, records, and documents) that are stored in each repository should then be established and indicated in the second column. Initially, each repository should be identified as 'unmanaged'. (A strict definition of 'managed' is proposed at the bottom of the tool.) As individual objectives in the RIM Strategy are implemented, some repositories will be eliminated. Others will meet the definition of a 'managed' repository and the number of IRs stored there should then be moved to the next 'managed' column. At all times, this tool indicates the percentage of IRs that are being managed according to the City's definition. Typically, at the beginning of RIM implementation, this is a very low value.

This tool may also be used to prioritize RIM initiatives. To do so, the City should establish a quantitative estimation of the risk to which information is exposed by virtue of its storage in each repository, recording this value in the 'Volume-independent risk' column. Multiplying the value in that, squared, by the 'Total number IRs', will yield a 'Total Risk Rating'. The repository with the highest 'Total Risk Rating' should be assigned the highest priority for clean-up, control, elimination, or other mitigating effort.

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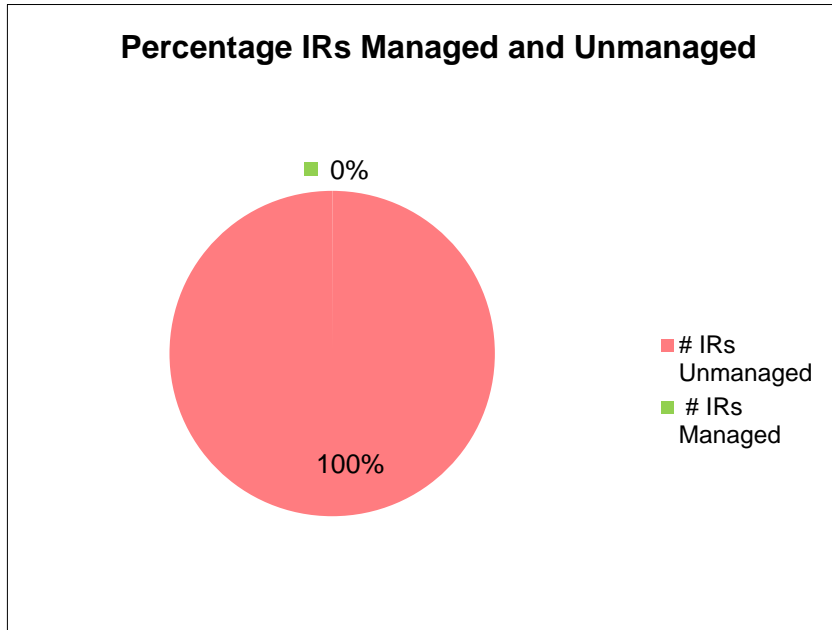
Repository <representative examples – City list tbc>	# IRs Unmanaged	# IRs Managed	Total # IRs	Vol-ind Risk	Total Risk Rating	Priority
Systems of Record	5,000,000	0	5,000,000	5	12500	4
- WAM, etc. <list each individually>						
Internet Sites	200	0	200	1	0	16
Intranet Sites	400	0	400	3	0	15
Shared Drives	442,446	0	442,446	5	1106	6
E-mail Accounts	2,000,000	0	2,000,000	5	5000	1
E-mail Archives	2,500,000	0	2,500,000	4	4000	3
Shared drives (T: drives)	2,500,000	0	2,500,000	4	4000	3
MyDocuments (personal drives)	525,763	0	525,763	5	1314	5
Hard Drives	60,300	0	60,300	6	217	7
Employee Filing Cabinets	60,300	0	60,300	5	151	8
Team Filing Cabinets	7,650	0	7,650	4	12	12
Record Centre	400,000	0	400,000	1	40	10
Offsite Storage	10,000,000	0	10,000,000	2	4000	2
Employee Homes	10,000	0	10,000	8	64	14
External Devices	15,000	0	15,000	6	54	9
Externally Hosted Servers	10,000	0	10,000	10	100	13
ECM	0	0	0	0	0	-
% Managed:	21,042,059	0	21,042,059			

*1 IRs are 'unmanaged' if there is no officer who is responsible to apply RIM business rules to the repository, if there is no attempt at standardization, classification or retention, where security and access cannot be methodically controlled, and where disposition is arbitrary.

*2 IRs are 'managed' if they are created in a standardized way, are classified using the function-based classification scheme, are stored in a repository that is accessible by the Program Manager, Information, Privacy and Elections and where security is being controlled, are being retained for an approved retention period, and are being disposed of leaving residual a record of destruction/disposition (i.e. in accordance with the RIM policy)

employees

<tbd>



Appendix 6: Proposed Information Governance Steering Committee (IGC) Framework/Terms of Reference

This appendix provides a proposed framework and terms of reference for the Information Governance Committee which will replace the Information Technology Governance Committee (ITGC).

Because the IGC will replace the ITGC, the proposed terms of reference for the IGC incorporate the content of the Information Technology Governance Committee (ITGC) Framework/Terms of Reference dated May 14, 2015, as published on the City's Intranet. Proposed revisions to that document (excluding formatting revisions) are indicated in tracked changes in this appendix.

~~Information Technology Governance Committee (ITGC)~~

Information Governance Committee (IGC)

Mandate

The ~~ITGC~~-IGC is responsible for defining strategic directions for and oversight of information governance corporate technology based on corporate and Council priorities. Information governance is “the specification of decision rights and an accountability framework to encourage desirable behavior in the valuation, creation, storage, use, archival and deletion of information. It includes the processes, roles, standards and metrics that ensure the effective and efficient use of information in enabling an organization to achieve its goals.”¹²¹

A member of ET that is part of the ~~ITGC~~-IGC will chair the Committee.

The Committee will guide the development, implementation, and sustainability of the City's RIM, access to information/privacy, and IT services/programs. Specifically, the Committee will:

- Ensure the City's policies, procedures, practices, and technologies for managing information (or which affect the management of information) meet business needs while also complying with legislated/regulated requirements and both managing and mitigating risk.
- Guide IT funding and evaluation, and make decisions regarding large scale investments within the context of the enterprise IT applications and infrastructure services portfolio.
- Promote a collaborative and transparent approach to delivering on the RIM and technology strategy, recognizing the shared responsibility for the strategies' successful implementation and ongoing sustainability leveraging technology.
- ~~The Committee will be~~ responsible for setting expectations and monitoring RIM program and IT service delivery. The intent of the ~~ITGC~~-IGC is to ensure that organizational decisions regarding technology information governance are considered and supported by a broad cross section of corporate leaders.

Duties and Responsibilities

- Defines corporate RIM, access to information/privacy, and IT guiding principles
- Owns and manages the corporate RIM and technology strategy
- Agrees and endorses the criteria for evaluation of technology information governance projects
- Accountable for supporting annual RIM and IT capital priorities and budget

¹²¹ Debra Logan, Gartner [2010] http://blogs.gartner.com/debra_logan/2010/01/11/what-is-information-governance-and-why-is-it-so-hard/

- Provides oversight for the IT Portfolio (projects, assets, resources)
- Approves [RIM, access to information/privacy, and IT annual work plans](#) and approves significant changes to the work plans throughout the year
- Approves new [IT-information governance investments, including IT investments](#)
- [IT-RIM, access to information/privacy, and IT](#) policy review, approval and endorsement
- Approval of multi-year strategic work programs from Steering Committees
- Monitoring strategic [IT-information governance](#) KPI's
- Endorse the [IT-information governance](#) Annual report to Council

Meetings

Two-hour meetings up to ~~eight~~ten times per year.

Voting Membership

Rotating membership will be assessed on an annual basis.

- DCAO Corporate Services (Chair)
- Member of the Executive Team (Alternate Chair)
- [ITGC-Steering Committees Chairs \(Chair of the RIM/Privacy Steering Committee and Chairs of the IT Steering Committees\)](#)
- GM Finance/Treasurer
- [City Clerk](#)
- [City Solicitor](#)
- GM, Technology and Innovation
- General Managers/Managers x 2 (Annual Rotating)

Other Attendance (non-voting)

- IT Management Team
- IT Admin Assistant
- [Program Manager, Information, Privacy and Elections](#)
- [RIM Specialist](#)

Logistical Notes

- Meetings should be pre-scheduled into a regular time slot and booked into members' calendars for the following 12 months
- Agenda's and supporting meeting materials should be circulated **3-5 business days** ahead of the meeting via [ITGC-IGC](#) Infonet site
- Meeting minutes will be recorded and distributed no less than **3 business days** after the meeting via [ITGC-IGC](#) Infonet site
- Meeting agendas and minutes will be posted and accessible to all City staff via [ITGC IGC](#) Infonet site
- Previous meeting minutes will be reviewed at the subsequent meeting
- An action list will be maintained for review at each subsequent meeting

RIM/Privacy Steering Committee

Mandate

The RIM/Privacy Steering Committee will support the development, implementation, and sustainability of the RIM program, and support the City's existing access to information/privacy program. The Committee will operate strategically to develop corporately agreed approaches to RIM program and access to information/privacy services delivery to ensure that all corporate effort is aligned, RIM and access to information/privacy services meet wider corporate objectives, and that benefit can be widely shared, and support the City in being compliant with RIM and access to information/privacy legislation.

General Duties for Steering Committees

- Develop multi-year RIM strategy, road maps and work plans
- Develop multi-year access to information/privacy road maps and work plans
- Review and give feedback on draft RIM and access to information/privacy policies, procedures, training presentations, etc.
- Oversee and participate in the delivery of projects as part of the RIM and access to information/privacy programs
- Review and endorse privacy impact assessments (PIAs) for new technologies or processes involving personal information
- Monitor progress against RIM and access to information/privacy projects and plans
- Members of the Steering Committee are expected to evangelize the RIM program and the importance of access to information/privacy in the City's operations

Meetings

Two-hour meetings to be held monthly during the initial years of the RIM strategy's implementation. Future meeting frequency will be determined by the activity associated with the group.

Membership

Membership or changes of membership of the RIM/Privacy Steering Committee will be approved by the IGC. The Steering Committee will be chaired by the Program Manager, Information, Privacy and Elections, and will include the RIM Specialist, a liaison from Information Technology Services, and 8-10 employees from service areas/departments (representatives of the RIM program client base and/or employees responsible for responding to freedom of information requests and dealing with privacy matters). The service area/department representatives will serve one year terms and those appointments will be rotated across the service areas/departments.

ITGC Steering Committees

Mandate

The ~~IT Governance Committee~~IGC may establish IT Steering Committees from time to time. They may be long standing groups (to oversee a core business system), or may be created with a limited life span to address particular initiatives or a program of work (e.g. implementing a City Teleworking strategy), and may be dissolved once the work program is concluded. These collaborative groups are established to operate strategically, to develop corporately agreed approaches to strategic areas to ensure that all corporate effort is aligned, that solutions meet wider corporate objectives and that benefit can be widely shared. ITGC Steering Committees are not intended to be application user groups and are also not intended to be involved in the day to day operation of services.

General Duties for Steering Committees

- Develop multi-year strategy, road maps and work plans to deliver business requirements
- Collaboratively prioritize initiatives across departments – identifying opportunities for collaboration
- Oversee and participate in the delivery of projects as part of the program
- Monitor progress against projects and plans
- Members of the Steering Committee are expected to evangelize the program or application, to ensure that opportunities are aligned with wider program or application objectives

Meetings

As required, meeting frequency will be determined by the activity associated with the group.

Membership

Membership or changes of membership of the Steering Committees will be approved by the ~~ITGC~~IGC. Each Steering Committee will be chaired by a General Manager or Manager, and will include representation from key stakeholder departments and IT. All Steering Committee Chairs will serve as full voting members of the ~~ITGC~~IGC.

Roles and Responsibilities

Guelph's IT Governance Framework is comprised of the following groups/_committees and individuals:

- **IT-Information Governance Committee:** members of Senior Leadership charged with IT decision making regarding strategic directions, IT investments, policy and approval of corporate IT architectures and standards as well as overall prioritization of IT initiatives. The intent for this group is to ensure that the strategic vision

regarding technology is aligned corporately in order to maximize its overall impact on driving business, innovation and service delivery.

- **GM, Technology and Innovation:** responsible for leading the development of technology strategy and policies, overseeing the operation of the IT governance framework, and acting as an advisor to the ~~ITGC~~ IGC on how the City can leverage technology most effectively. The GM, Technology and Innovation has management responsibility for the IT department and facilitates IT decision making by providing insight and transparency to the ~~ITGC~~ IGC in relation to the overall IT environment, processes and resource utilization.
- **ITGC Steering Committees:** these groups are convened around Enterprise Systems ~~and~~ (Amanda, Finance and HR, and GIS) and major work programs (such as mobile working, web, information management). They are responsible for developing strategies, work plans and prioritizing projects (for proposal forward) within program areas – to ensure that projects and initiatives are complementary and aligned. Strategies developed by these Steering Committees are to be reviewed and approved by the ~~ITGC~~ IGC. New committees may be formed or existing committees reconfigured by approval of the ~~ITGC~~ IGC from time to time.
- **IT PMO:** This group is responsible for defining intake processes, leading the development and applying the evaluation criteria for IT projects, monitoring and reporting upon IT capacity and resource utilization, management and reporting of the overall IT portfolio, and operating checkpoints for the IT project management process to ensure compliance with project management standards.

Appendix 7: Version Control Log

This appendix provides the history of the drafting and finalization of the RIM Strategy.

Date	Description	Author
June 8, 2015	Draft.	Sheila Taylor Ergo Information Management Consulting
July 8, 2015	Revised to reflect Project Team feedback received on June 22, 2015 (teleconference) and on June 24, 2015 and June 26, 2015 (written submission), and clarifications subsequently obtained from the Program Manager, Information, Privacy and Elections if/as required.	Sheila Taylor Ergo Information Management Consulting
July 28, 2015	Revised to reflect additional Project Team feedback received on July 21, 2015 and July 23, 2015, clarifications received from the Program Manager, Information, Privacy and Elections on July 21, 2015, and final edits for correct grammar and consistent formatting if/as required.	Sheila Taylor Ergo Information Management Consulting