

OVERVIEW:

According to ISO 15489-1 and -2 *Information and Documentation – Records Management*, Part 1 (General) and Part 2 (Guidelines), in order to design and implement sustainable record systems, a design and implementation methodology is essential. The ISO methodology given below in items **a)** to **h)** is not designed to be linear. The tasks may be undertaken in different stages, iteratively, partially or gradually, in accordance with organizational needs, formal compliance requirements and changes to the organizational and records management environment.

These tasks have been organized into three distinct phases as identified by Dr. Laura Millar in her “Memorandum on Records Management Planning” submitted to the UNBC -PEC on 13 December 2010. These three phases are also identified as the broad project goals for the 2013-2014 UNBC Records Management Project.

Also at the recommendation of Dr. Millar, these phased activities will be facilitated so as to integrate the “Principles¹” as defined by ARMA International in the “Generally Accepted Recordkeeping Principles: Information Governance Maturity Model” (2013):

The Principles 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. In doing so, they give assurance to the public and society at large that organizations of every kind are meeting their responsibilities with respect to the governance of information.

Each of the 8 Principles as defined by ARMA, have been broken down into identifiable tasks by principle by the RM Coordinator, and will be incorporated largely into Phase 2, and partially into Phase 3 of the Information Management Strategic Plan as relevance dictates.

DESIGN AND IMPLEMENTATION METHODOLOGY:

PHASE I: Identification of records and information management requirements and development of a project plan.

- a) **Preliminary investigation.** Collect information from documentary sources and through interviews; identify and document the role and purpose of the organization, its structure, its legal, regulatory, business and political environment, critical factors and critical weaknesses associated with records management.

- b) **Analysis of business activity.** Collect information from documentary sources and through interviews; identify and document each business function, activity and transaction and establish a hierarchy of them, that is, a business classification system, and identify and document the flow of business processes and the transactions which comprise them.

¹ “Generally Accepted Recordkeeping Principles” a.k.a. “The Principles” as developed and published by ARMA International

- c) **Identification of requirements for records.** Collect information from documentary sources and through interviews; identify the requirements for evidence of and information about each business function, activity and transaction which should be satisfied through records. The requirements can be derived from an analysis of the organization's regulatory environment (see clause 5) and the risk of not creating and maintaining the records. Determine how each requirement may be satisfied through records management processes, and articulate and document the requirements for records. Choose the appropriate records structure which best satisfies each business function, activity or transaction.
- d) **Assessment of existing systems.** Identify and analyze existing records systems and other information systems to measure their performance against the requirements for records.

Notes on Phase 1 Methodology:

- **University Records Survey:** The Records Management Coordinator proposes the immediate facilitation of a University Records Survey² to be undertaken both via UNBC's Limesurvey software in conjunction with follow-up in person interviews. The intended participants of this internal survey are employees in administrative support positions throughout UNBC's Prince George campus. The information being sought through this medium pertains to office/department: records management procedures, extent of paper/electronic records, security measures, legal compliance, departmental mandate, records access, storage locations, disposition measures, formats, etc... The results of this survey will constitute an internal document and will serve as the basis for all records and information management program development strategies. *[Once this proposed methodology is accepted, permission will be sought from the Office of the Provost to enable proceeding with this survey – see footnote 2]*
- **Information Governance Maturity Model:** Also to be undertaken as a result of the data gathered via the University Records Survey, the Records Management Coordinator proposes to undertake the ARMA International's "Information Governance Maturity Model" - a tool which will assist in the evaluation of an organization's current "maturity" level of information governance programs and practices. The application of this tool at the outset of this project will provide a benchmark by which to measure progress both at the conclusion of this project and as a result of future RM developments.

² In an email dated March 1, 2013 between Erica Hernandez-Read and Rheanna Robinson: after consulting with REB Chair, Michael Murphy, Ms. Robinson stated that "as long as your findings will stay internal only and never be reported or presented on outside of UNBC, then ethics is not required" prior to facilitation of this survey. She also "recommended to ensure there has been consultation and permission granted from the Provost's office and to utilize a UNBC-based electronic survey only."

PHASE 2: Develop and implement enhanced records policies and procedures.

- e) **Identification of strategies for satisfying records requirements.** Identify strategies for satisfying records requirements, which may include adopting policies, standards, procedures and practices, designing new systems and implementing systems in a way which satisfies a requirement for records. Strategies may be applied to each records requirement separately or in combination. Strategies should be selected on the basis of the degree of risk involved through failure to satisfy a requirement, either within the business function which the records system is intended to support, the existing systems environment or the corporate culture in which the strategy should succeed.

The “Principles” applied

1) **Goal: Accountability:** An organization shall assign a senior executive who will oversee a recordkeeping program and delegate program responsibility to appropriate individuals, adopt policies and procedures to guide personnel, and ensure program auditability

Means through which to achieve goal:

- Establish an organizational structure within which to situate an RM program (chain of command)
- Assign defined RM roles and responsibilities to staff
- Determine Senior Executive or governing body to which RM Program will ultimately report
- Establish RM policies and procedures, have them approved and communicated to personnel
- Ensure Auditability, that is, “the process designed to prove the program is accomplishing its goals, while seeking areas for improvement to further protect the organization and its records”:
 - Staff should be able to demonstrate program awareness, that is:
 - Records should be retained for the right amount of time and disposed of when no longer required.
 - Policies should be kept up-to-date and cover all records media.
 - Auditing should verify the status of complying with these standards.

2) **Goal: Integrity:** A recordkeeping program shall be constructed so the records and information generated or managed by, or for, the organization have a reasonable and suitable guarantee of authenticity and reliability. *Integrity* of a record is directly related to the ability to prove that a record is authentic and unaltered. *Authenticity* requires proof that a document comes from the person, organization, or other legal entity claiming to be its author or authorizing authority.

Means through which to achieve goal:

- Develop formal RM policy and procedures which are approved by senior management in order to ensure records being accepted as evidentiary value

- Define authority within policy: who is responsible for maintaining adherence to RM policy/procedures
- Ensure effective information management training and clearly worded procedures and protocols for employees who interact with RM program
- Develop, maintain and ensure that consistent recordkeeping practices are in place throughout the records lifecycle
- Integrate an identifiable audit trail (quality assurance) within RM procedures to ensure authenticity

3) Goal: Protection:A recordkeeping program shall be constructed to ensure a reasonable level of protection to records and information that are private, confidential, privileged, secret, or essential to business continuity.

Means through which to achieve goal:

- Ensure appropriate level of protection of records throughout the records lifecycle through:
 - Laws, regulations, corporate governance
 - Appropriate security structure so only authorized personnel have access to information required for their daily duties (key card access restrictions, locked cabinets, passwords, etc..)
 - Ensure access controls are changed when employees leave their positions
 - Ensure information is protected from “leaking” (i.e. prevent files from leaving building through mechanical/electronic means; ensure sensitive electronic information cannot be emailed, downloaded, posted or otherwise made available electronically) – clearly identify such safeguards in policy
 - Identify procedures/controls for declassification of confidential/privileged information (i.e. when sensitive material must be accessed by external counsel to assist in litigation)
 - Integrate security/confidentiality into final disposition no matter if archived or destroyed – records should only be handled by personnel with appropriate security clearance
 - An audit program with a clear process to ascertain whether sensitive information is being handled in accordance with outlined policies

4) Goal: Compliance:The recordkeeping program shall be constructed to comply with applicable laws and other binding authorities, as well as the organization’s policies.

Means through which to achieve goal:

- This is largely accomplished through adopting and enforcing suitable policies and procedures (which in turn incorporate lawful compliance) to direct and control recordkeeping and record making (i.e. RM policy; Record Retention Schedules and Disposition Authorities)
 - The recordkeeping system must contain information showing that the organization’s activities are conducted in a lawful manner

- Personnel must know what information must be entered into its records to demonstrate that its activities are being conducted in a lawful manner
- Personnel must enter that information into its records in the manner prescribed by law
- Personnel must maintain its records in the manner and for the time prescribed by law - the recordkeeping system is itself subject to legal requirements (i.e. such as requirements to maintain tax or other records)

6) Goal: Retention: An organization shall maintain its records and information for an appropriate time, taking into account legal, regulatory, fiscal, operational, and historical requirements.

Means through which to achieve goal:

- Legal and regulatory – federal, provincial, local/international laws for determination of minimum retention period; legal research and consultation with legal counsel to determine all records retention requirements met
- Fiscal - legal research and consultation with legal counsel to determine fiscal retention requirements
- Operational – must determine how long records are required to satisfy business needs, usually determined by interviewing the person(s) most knowledgeable about operational value of each record type
- Historical – identify records which depict history of an organization, such as: articles of incorporation, bylaws, charters and Board of Director’s minutes

7) Goal: Disposition: An organization shall provide secure and appropriate disposition for records that are no longer required to be maintained by applicable laws and the organization’s policies.

Means through which to achieve goal:

- If records are converted or migrated to new media, disposition of the previous media may also be warranted.
- Disposition of relevant records must be suspended in the event of pending or ongoing litigation or audit. The organization should designate records that are to be held pending resolution of the litigation or audit and notify all affected personnel when the hold is issued and when the hold is released.
- Destruction of records must be performed in a secure manner, ensuring that records to be destroyed are transported securely and destroyed completely. The organization may choose to utilize “green” methods of destruction, but destruction must always be performed in a manner that renders the records completely and irreversibly destroyed.
- The transfer of records to the custody of a historical archives, library, or museum should be documented as part of the organization’s records retention policy.
- Disposition of records must be governed by appraisal of the records by a qualified professional upon the basis of the historical or intrinsic value of the records.

8) Goal: **Transparency**: The processes and activities of an organization's recordkeeping program shall be documented in an understandable manner and be available to all personnel and appropriate interested parties.

Means through which to achieve goal:

- Ensure records documenting the recordkeeping program adhere to the fundamentals of records management:
 - Document the principles and processes that govern the program
 - Accurately and completely record the activities undertaken to implement the program
 - Be written or recorded in a manner that clearly sets forth the information recorded
 - Be readily available to legitimately interested parties
 - Make apparent and understandable the RM structure, processed and activities

Phase 3: Investigate software tools to support records creation, management, and preservation, particularly for electronic records.

- f) **Design of a records system.** Design a records system which incorporates the strategies, processes and practices described in ISO 15489; ensure that the records system supports, and does not hinder, business processes; assess and, if necessary, redesign business processes and operational business and communication systems to incorporate records management.

The "Principles" applied

2) Goal: **Integrity**: A recordkeeping program shall be constructed so the records and information generated or managed by, or for, the organization have a reasonable and suitable guarantee of authenticity and reliability. *Integrity* of a record is directly related to the ability to prove that a record is authentic and unaltered. *Authenticity* requires proof that a document comes from the person, organization, or other legal entity claiming to be its author or authorizing authority.

Means through which to achieve goal:

- Develop formal RM policy and procedures which are approved by senior management in order to ensure records being accepted as evidentiary value
- Integrate an identifiable audit trail (quality assurance) within RM procedures to ensure authenticity
- Ensure reliability of RM e-system through control, regulation, updating and auditing of hardware, network infrastructure and software

3) Goal: **Protection**: A recordkeeping program shall be constructed to ensure a reasonable level of protection to records and information that are private, confidential, privileged, secret, or essential to business continuity.

Means through which to achieve goal:

- Ensure appropriate level of protection of records throughout the records lifecycle through:
- Appropriate security structure so only authorized personnel have access to information required for their daily duties (key card access restrictions, locked cabinets, passwords, etc..)
- Ensure access controls are changed when employees leave their positions
- Ensure information is protected from “leaking” (i.e. prevent files from leaving building through mechanical/electronic means; ensure sensitive electronic information cannot be emailed, downloaded, posted or otherwise made available electronically) – clearly identify such safeguards in policy
- Identify procedures/controls for declassification of confidential/privileged information (i.e. when sensitive material must be accessed by external counsel to assist in litigation)
- Integrate security/confidentiality into final disposition no matter if archived or destroyed – records should only be handled by personnel with appropriate security clearance
- An audit program with a clear process to ascertain whether sensitive information is being handled in accordance with outlined policies

5) Goal: Availability: An organization shall maintain records in a manner that ensures timely, efficient, and accurate retrieval of needed information.

Means through which to achieve goal:

- Information must be described during the capture, maintenance and storage processes in such a way as to make retrieval effective and efficient: *metadata* needs to be documented and utilized in all records systems in order to document descriptive information about the records
- Ensure preservation of records to maintain continued access through regular data backup and migration, proper physical storage
- Remove obsolete/redundant records and related information from information systems in accordance with RRSDAs
- Provisions must be made within RRSDAs to suspend disposition in the event of pending or ongoing litigation or audit
- Develop well-designed storage processes and properly structured information to ensure access to understandable, retrievable, relevant and consistent information

g) **Implementation of a records system.** Implementing a records system should be undertaken systematically using project planning and methodologies appropriate to the situation and with a view to integrating the operation of records systems with business processes and related systems.

- h) **Post-implementation review.** Gather information about the performance of the records system as an integral and ongoing process. This may be undertaken by interviewing members of management and key employees, using questionnaires, observing the system in operation, examining procedures manuals, training materials and other documentation, and carrying out random checks on the quality of records and control measures. Review and assess the performance of the system, initiate and monitor corrective action and establish a regime of continuous monitoring and regular evaluation.

References

- ARMA International, “Generally Accepted Recordkeeping Principles: Information Governance Model”
- ARMA International, “Generally Accepted Recordkeeping Principles”
- “Memorandum on Records Management Planning” submitted to the UNBC - PEC on 13 December 2010 by Dr. Laura Millar
- ISO 15489-1 *Information and Documentation – Records Management: General*
- ISO 15489-2 *Information and Documentation – Records Management: Guidelines*
- University of British Columbia, “University Records Survey Project: forms,” 2003

See Attached Appendices:

1. ARMA International, “Generally Accepted Recordkeeping Principles: Information Governance Model”
2. ARMA International, “Generally Accepted Recordkeeping Principles”
3. Draft University Records Survey Questions
4. UNBC Records Management Program Development Timeline: 2013-2014 Project
5. “Records Management at UNBC”
6. “Records Management Business Case/Proposal” - prepared for President’s Executive Council (for Budget Submission 2011/2012) by the [ad hoc] Records Management Committee, which includes “Memorandum on Records Management Planning” submitted to the UNBC - PEC on 13 December 2010 by Dr. Laura Millar