

Base Budget – Briefing Note

2022 Budget

Corporate Information Management

Briefing Note required for:

- items +/- \$50,000 or more
- changes in FTE
- Council Priority requests

Dept	Division	Item	Base Supp	Amount	FTE Impact
CS	Municipal Governance	Corporate Information Management Staffing	Base	\$266,055	2.00
		Total		\$266,055	

Background:

On November 9, 2020 Council approved the following motion under the consent agenda:

1. The Municipal Modernization – Electronic Document and Records Management System (EDRMS) Assessment be awarded to The Information Professionals at a total value of \$79,665.
2. The total project cost of \$79,665 be funded from the existing Capital Budget for an Electronic Records Management System.

The Information Professionals (The Info Pros) is a privately owned and operated Management Consulting firm, providing advisory services pertaining to Information Governance and Compliance programs, policies, procedures, and systems. The company has over 30 years of experience, been engaged with over 400 records management projects and has over 250 active Municipal customers.

The Municipality of Chatham-Kent engaged the consultant from March to September 2021, to complete a current state assessment, analyze the records management program and provide recommendations, strategy, and a plan for moving electronic information management forward within the organization.

The analysis conducted by The InfoPros identified several gaps between the Municipality's current elements of an Information Management Program, industry standard best practice, and the essential elements to ensure a successful digital information management solution implementation. The importance of any recommended solutions integrating well with information technology tools, and within a longer-term strategy, was emphasized.

Comment:

Council approved the following recommendations at the October 25, 2021 Council meeting:

1. The Information Management Assessment, Strategy and Plan be received.
2. An Information Management Resource Team consisting of 3 FTE's reporting to Municipal Governance be considered during the 2022 budget deliberations.

Comment:

3. The required supplemental budget to implement the Corporate Information and Records Management projects be considered during the 2022 budget deliberations.

The Report to Council and Assessment Review is attached to this briefing note (Appendix A).

The Needs Assessment indicates three dedicated information management roles are necessary for an organization the size of the Municipality of Chatham-Kent. During 2022 budget discussions, it is administration's recommendation to bring those three positions forward for Council's consideration. At the time, two positions would be recommended as a base budget addition and one position would be a three-year supplemental request to allow time for the project to be completed. Once implemented, the supplemental position can be reviewed for necessity.

All three of these recommended staff roles will need to work closely with Information Technology & Transformation Staff, for the implementation of the Corporate Information Management Program and for the implementation and sustainment of Microsoft 365.

It is the intent of administration to **not increase the overall FTE count** of the organization; rather, over the course of the projects, a commitment to ensure a reduction of three or more FTEs, across the organization, be achieved through efficiencies as a result of the information and records management projects moving forward. It is expected that this initiative, as part of the implementation of Microsoft 365 will have long-term efficiencies across the organization for years to come.

Lack of online data management was also outlined in the Interim Report of KPMG that was presented to Council on September 27, 2021. It stated:

- Councillors believe more operational efficiencies can be achieved through improvements in technology and data management. Operational processes could be streamlined and rationalized to create staff capacity (e.g. transition away from paper processes).
- The Municipality has identified digital service transformation as a priority in supporting the delivery of strategic priorities.
- The organization as a whole could improve its data management process and capabilities.

The risks of not following through with this strategy include:

- Non-compliance with applicable legislation
- Potential for loss and/or theft of vital information
- Inconsistent information management practices
- Inability to support litigation or access to information requests
- Inability to ensure protection of information from unauthorized access
- Inefficient search and retrieval of information, in a timely manner to support effective decision-making
- Inability to complete the Microsoft 365 implementation according to best practice. This may create substantial rework and remediation within all municipal divisions for documents and content within all departments/divisions in future.

The remainder of the request is supplemental and included as a project in the Capital budget.

Municipality of Chatham-Kent**Corporate Services****Municipal Governance**

To: Mayor and Members of Council
From: Judy Smith, Director, Municipal Governance/Clerk
Date: October 7, 2021
Subject: Corporate Information Management

Recommendations

It is recommended that:

1. The Information Management Assessment, Strategy and Plan be received.
2. An Information Management Resource Team consisting of 3 FTE's reporting to Municipal Governance be considered during the 2022 budget deliberations.
3. The required supplemental budget to implement the Corporate Information and Records Management projects be considered during the 2022 budget deliberations.

Background

On November 9, 2020 Council approved the following motion under the consent agenda:

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The Municipality of Chatham-Kent engaged the consultant from March to September 2021, to complete a current state assessment, analyze the records management program and provide recommendations, strategy, and a plan for moving electronic information management forward within the organization (Appendix A).

The analysis conducted by The InfoPros identified several gaps between the Municipality's current elements of an Information Management Program, industry standard best practice and the essential elements to ensure a successful digital information management solution implementation. The importance of any recommended solutions integrating well with information technology tools, and within a longer-term strategy, was emphasized.

Comments

Like many corporations, the Municipality is currently facing information management challenges associated with a growing volume of electronic documents in a largely unmanaged state. Most of the Municipality's corporate records reside on network drives and within email with attachments. Multiple versions of documents, multiple folders and subfolders and inconsistent naming conventions contribute to poor search and retrieval capabilities and with no ability to add metadata (data that describes and gives more meaningful information describing what the document is) or apply the required retention periods to documents.

The Municipality leverages The Ontario Municipal Records Management System (TOMRMS) for its information classification scheme. In line with best practices, TOMRMS includes high-level functions and activities, scope notes, retention periods and references to applicable legislation which is updated annually. TOMRMS has not been consistently implemented across all departments and where it has been implemented, its application has been limited to the management of physical (paper-based) records. That said, **most departments have discontinued the management of physical records which implies that both physical and electronic records are not being effectively managed within the Municipality.**

Importantly, employees at the Municipality have not received digital records management training as few processes, procedures, tools, and support systems are currently in place. Records and information management practices have evolved substantially over the last 15 years which means the Municipality's practices are outdated and not aligned.

The Municipality's Information and Records Management practices are overseen by the Municipal Governance/Clerk Department; however, individual departments have established their own individual practices. The lack of a dedicated records management team providing guidance and support on the management of information to Departments across the Municipality **has resulted in a growing volume of information and the inability to conduct e-discovery to respond to FOI requests or potential litigation efficiently. It is necessary to ensure compliance with**

legislation. At this time, digital records management advice is not being provided. This is primarily due to not having dedicated operational staff to establish and manage the program (processes, procedures, tools, and support systems) and support, sustain, and evolve the program over time.

This lack of online data management was also outlined in the Interim Report of KPMG that was presented to Council on September 27, 2021. It stated:

- Councillors believe more operational efficiencies can be achieved through improvements in technology and data management. Operational processes could be streamlined and rationalized to create staff capacity (e.g. transition away from paper processes).
- The Municipality has identified digital service transformation as a priority in supporting the delivery of strategic priorities.
- The organization as a whole could improve its data management process and capabilities.

The summary Information Management Assessment recommendations for the Municipality of Chatham-Kent include the establishment of an operational team dedicated to Information and Records Management as well as establishing policies, procedures, training and implementing the required projects as follows:

Implement an Information Management Program

- Records Inventory and Classification
- Review Existing Classification Structure
- Validate Retention Schedule
- Develop Naming Convention Standards
- Provide Naming Convention Standards Training
- Records Retention Policies and Schedules
- Policies: Revise Records Management Policy, Establish Electronic Records Policy, Establish Security and Access Rights Policy
- Procedures: Review Existing Procedures, Establish Review Schedule, Consider Procedures Required to Support Information Management Implementation
- Dedicated Records Management Personnel
- Disaster Prevention and Recovery Planning
- Records Disposition

Physical Records Management

- Review Inactive Physical Records
- Conduct Regular Inactive Records Disposition
- Engage Offsite Storage Provider for Management of Inactive Records

Collection, Access, and Protection of Information

- Revise and Implement Privacy Risk Assessment (PIA) Tool
- Establish Personal Information Bank (PIB)
- Define Privacy Audit Procedures and Tools
- Develop Information Access and Privacy Policy
- Develop Freedom of Information Process Map
- Develop Privacy Awareness and Training Sessions

Information Management Technologies

- Leverage the existing investment in Microsoft 365 & SharePoint Online to implement an Electronic Document and Records Management Solution

In the 2021 budget process, Council endorsed and approved the budget required to implement Microsoft 365 and SharePoint Online as part of the Corporate Digital Transformation project within Information Technology and Transformation. The Microsoft 365 platform requires information management and governance to ensure oversight for information protection (discovering, classifying, and protecting sensitive information), information governance (retention policies, retention labels) and records management (records declaration, retention and disposition).

The following Microsoft diagram provides a visual explanation of the information and records management considerations required for a best practice Microsoft 365 platform implementation.



Figure 1 Source Microsoft Information Governance in Microsoft 365

Information Technology & Transformation has a consultant currently engaged to begin the Microsoft 365 implementation as approved via the [RTC of June 14, 2021, Implementation of Microsoft 365](#).

Both Microsoft 365 and the recommendations within this report require an on-going operational team dedicated to Information and Records Management as these positions and skill sets do not exist currently within Municipal Governance, Information Technology & Transformation or elsewhere in the organization. In future, all staff will hold some level of responsibility for conforming to the information and records management program, policies and procedures as implemented by the recommended operational team and projects as outlined.

The Projects required for the implementation of Information and Records Management for the Municipality of Chatham-Kent includes:

2021 to 2022 – Year 1	2023 – Year 2	2024 – Year 3
Establish Information Management Program	Continue Implementation of SharePoint online	Continue Implementation of SharePoint Online
Engage Dedicated Information Management Resources	Network Drive Cleanup	Business Process Automation
Implement Governance Steering Committee	Network Drive Migration to SharePoint Online	Training and Awareness
Define SharePoint Online Information Architecture	Training and Awareness	
Training and Awareness		

The Business Case for Establishing Corporate Information and Records Management

Business Case for Establishing Information Management and Governance for Microsoft 365 Reference: <https://www.infotechtion.com/post/the-business-case-for-establishing-information-governance-for-office-365-and-beyond>

Strategic Benefits:

- Add value - better connecting people, information, and knowledge will improve customer engagement and create a more effective workforce.
- Identify new opportunities - historic information may be used to predict - and change - the future.
- Establish a foundation for digital transformation - eliminating unstructured information enables you to connect information across your organization. It will then be easier to start business transformation initiatives.
- Minimize risks - it could take 10 years to establish your company as a solid brand, but only 10 minutes to destroy it if sensitive information is lost or

misplaced. We need to implement retention and disposition to meet requirements for data minimization and storage limitation.

- Reduce costs - better information management will help to improve and automate information intensive processes. It reduces the process and transactional costs such as the cost to process a claim or service a customer.

Operational Benefits:

- Improve search - better access to information will reduce the time knowledge workers have to spend looking for information.
- Improve knowledge sharing - better control of sensitive information means you can increase transparency by opening access to non-sensitive information.
- Single source of the truth - better information governance means knowledge workers can trust the information they find. They know it is the right file, right version, etc.
- Improve business continuity - better information governance means that information assets are locked and protected.
- Improve information security - knowledge workers collaborate with people both inside and outside the organization. Better information governance means that sensitive information is protected wherever it may go (e.g. automatic encryption), or you can stop it from leaving the organization.

Legal Benefits:

Information governance will ensure compliance with regulatory requirements for record keeping, but also privacy requirements for security by design, data minimization, and storage limitation. Benefits to consider:

- Regulatory compliance - there are a myriad of regulations that require an organization to keep information for a minimum set of years, but privacy regulations that require some information to be deleted when customers or staff leave. Better information governance will ensure you meet legal requirements for both minimum and maximum retention.
- Reduce eDiscovery costs - 68% of information kept by organizations is ROT - redundant, outdated and trivial. Better information governance allows you to automate the deletion of ROT, which will significantly reduce your eDiscovery costs.

Sources:

- [The Total Economic Impact of the Microsoft 365 E5 Solution, The Value of Creating the Modern Workplace, A Forrester Total Economic Impact™ Study](#) Commissioned By Microsoft

An excerpt from the report indicates that over 3 years:

- Information workers save 100 minutes per week due to improved collaboration and information sharing (coauthoring and reviewing documents).
- Frontline workers save 140 minutes per week from improved tools and information.
- Information workers save 104 minutes each week with improved online meetings.
- Highly-mobile workers save 24 minutes per day accessing systems and information.

Records Management Personnel

In an organization the size of the Municipality of Chatham-Kent, the Information Management Assessment recommends that personnel should consist of the following (at a minimum):

- An Information Management steering committee consisting of an executive sponsor and key stakeholders from Information Management, Information Technology, and each of the Municipality's departments.
- Three dedicated information management roles. (Manager, Privacy and Information; two Information Specialists/Analysts)
- A network of records coordinators to liaison between Information Management staff and their departments. Records coordination would be a responsibility added to existing roles in the organization.

From the Corporate Information Management Assessment report recommendations and research conducted, three FTE's dedicated to information and records management for an organization of our size is in line with industry standard. In a report from [ARMA international, 2016 | 2017 Information Governance Benchmarking Survey](#), organizations of up to 5,000 employees employed "more than one and up to four" FTE's dedicated to records and information management. Given the diversity of operations under the Municipal umbrella and the corresponding requirements for legislative compliance within those operations, administration agrees with the request for 3 staff positions.

The current Municipal Clerk position holds responsibility for fulfilling and discharging all statutory obligations under the Ontario Municipal Acts, Statues, and Regulations. The Director is responsible for managing the day-to-day administration of the government and affairs of the Municipality of Chatham-Kent including Council Administration, Records Management, Licensing Services and Municipal Elections. The Director is also responsible under the Freedom of Information and Protection Act for ensuring that information is made available to the public and committed to protecting the privacy of

individuals. With the increase in volume of FOI requests and the need to establish a Corporate Privacy Program, a dedicated resource is required to lead the information access and privacy program responsibilities in keeping with the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) as well as provide supervisory responsibilities for the two Information Specialists/Analyst. This position, referred to as the Manager, Privacy and Information will also develop and lead best-practice policies, procedures and initiatives related to information access, privacy, and records management.

The Needs Assessment indicates three dedicated information management roles are necessary for an organization the size of the Municipality of Chatham-Kent. During 2022 budget discussions, it is administration’s recommendation to bring those three positions forward for Council’s consideration. At the time, two positions would be recommended as a base budget addition and one position would be a three-year supplemental request to allow time for the project to be completed. Once implemented, the supplemental position can be reviewed for necessity.

All three of these recommended staff roles will need to work closely with Information Technology & Transformation Staff, for the implementation of the Corporate Information Management Program and for the implementation and sustainment of Microsoft 365.

It is the intent of administration to not increase the overall FTE count of the organization; rather, over the course of the projects, a commitment to ensure a reduction of three or more FTEs, across the organization, be achieved through efficiencies as a result of the information and records management projects moving forward. It is expected that this initiative, as part of the implementation of Microsoft 365 will have long-term efficiencies across the organization for years to come.

Budget Request Summary

A budget request will be brought before the Budget Committee outlining the overall cost of this strategy implementation.

	2022 – Year 1		2023 – Year 2		2024 – Year 3	
	Base	Supplemental	Base	Supplemental	Base	Supplemental
Staffing	275,000*	125,000**	0	125,000**	0	125,000**
Project Costs		1,200,000				
Less Reserve		-525,000				
TOTAL REQUEST	\$ 275,000.00	\$ 800,000.00	-	\$ 125,000.00	-	\$ 125,000.00

* 2 FTE and associated costs; ** 1 FTE and associated costs

The risks of not following through with this strategy include:

- Non-compliance with applicable legislation
- Potential for loss and/or theft of vital information
- Inconsistent information management practices
- Inability to support litigation or access to information requests
- Inability to ensure protection of information from unauthorized access
- Inefficient search and retrieval of information, in a timely manner to support effective decision-making
- Inability to complete the Microsoft 365 implementation according to best practice. This may create substantial rework and remediation within all municipal divisions for documents and content within all departments/divisions in future.

Areas of Strategic Focus and Critical Success Factors

The recommendations in this report support the following areas of strategic focus:

- Economic Prosperity:
Chatham-Kent is an innovative and thriving community with a diversified economy
- A Healthy and Safe Community:
Chatham-Kent is a healthy and safe community with sustainable population growth
- People and Culture:
Chatham-Kent is recognized as a culturally vibrant, dynamic, and creative community
- Environmental Sustainability:
Chatham-Kent is a community that is environmentally sustainable and promotes stewardship of our natural resources

The recommendations in this report support the following critical success factors:

- Financial Sustainability:
The Corporation of the Municipality of Chatham-Kent is financially sustainable
- Open, Transparent and Effective Governance:

The Corporation of the Municipality of Chatham-Kent is open, transparent and effectively governed with efficient and bold, visionary leadership
- Has the potential to support all areas of strategic focus & critical success factors
- Neutral issues (does not support negatively or positively)

Consultation

In addition to the consultant, a Project Team was in place consisting of a cross-section of municipal employees providing information and guidance to the consultant during the assessment.

Position Title
Director, Municipal Governance/Clerk
Director, Housing Services
Director, Budget & Performance Services
Director, Legal Services
Executive Assistant, Community Human Services
Executive Assistant, Infrastructure & Engineering Services
Human Resources Consultant, Human Resources & Organizational Dev.
Curator, CK Museum, Community Attraction & Leisure Services
Manager, Security & Risk, Information Technology & Transformation
Business Analyst, Information Technology & Transformation
Project Manager, Information Technology & Transformation

In addition, there were approximately 25 divisional interviews with 130 participants and over 90 responses to an online internal survey.

Financial Implications

The financial summary for the Information Management Strategy will be provided to Council during the 2022 budget deliberations for final approval.

Prepared by:

Judy Smith, CMO
Director, Municipal Governance/Clerk

Reviewed by:

Cathy Hoffman, MPA, CHRL
General Manager, Corporate Services/Chief Human Resource Officer

Consulted and confirmed the content of the consultation section of the report by:

Joann Kjeldsen
Project Manager, ITT

Catherine Fitzgerald
Director, ITT

Attachments
Appendix A – Information Management Assessment Report

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Presented To
The Municipality of Chatham-Kent

Delivered On
August 27th, 2021.

Deliverable

Information Management Assessment

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CONTACT

Nina Carter, President
The Information Professionals
613.298.6206
nina@the-infopros.com

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1. EXECUTIVE SUMMARY

The Municipality of Chatham-Kent (the Municipality) creates sizable volumes of information to enable the delivery of services to its community members and provide accountability and transparency for its actions. As these information resources are critical in the success of every endeavor, structured planning and management must occur to successfully deliver programs and services to the community.

The Municipality is concerned that current information management practices, along with supporting systems, may lack required elements to efficiently support business users' day-to-day activities and the Municipality's legislated compliance requirements to effectively manage and dispose of information in a timely manner. With the ultimate goal of improving the way information is used and managed within the Municipality, the Information Professionals was engaged to review the Municipality's information management program and supporting technologies, compare them to recognized best-practices, and provide recommendations to the Municipality to close identified gaps.

In partnership with the Municipality, the Information Professionals reviewed and analysed the Municipality's Information Management (IM) Program, including by-laws, policies, physical records management, systems of record (e.g., network drives, CK Central, Outlook and other applications and services). In addition, we received more than 95+ responses to our online records management survey and 25 interviews were conducted with municipal divisions and focused on current information management practices, technologies used, and challenges faced in their respective areas of specialization.

Together with the Steering Committee, The Information Professionals conducted a SWOT (Strengths, Weaknesses, Opportunities and Threats) workshop of the Municipality's information management practices. The SWOT analysis was used as a strategic planning technique to help the Municipality identify key priorities for action and prepare strategic options to manage potential issues and risks.

In addition to the SWOT workshop, The Information Professionals leveraged Gartner's Enterprise Information Management (EIM) maturity model. The EIM maturity tool was used to assess the Municipality's maturity regarding information management and provide the logical phases to successfully realize EIM objectives. The Information Professionals assessed the Municipality as a Level 2 – Opportunistic. Organizations assessed at Level 2 often have an awareness that information management challenges exist but have not yet formalized a strategy and plan to improve information management.

In summary, the analysis conducted by the InfoPros identified several gaps between the Municipality's current elements of an Information Management Program, industry standard best practice and the essential elements to ensure a successful digital information management solution implementation. Solutions needs to be responsive, reliable and stable. It needs to be able to capture all forms of records without encumbering users with time-consuming functionality. The functionality must integrate well with all information technology tools and within a longer-term strategy.

In short order, The Information Professionals recommends that the Municipality prioritize defining an information management program to create a foundation for legislative-compliant recordkeeping practices. In parallel to establishing these foundational elements, the InfoPros recommends working towards the implementation of Microsoft 365 (M365) to support the required technologies to effectively collaborate and manage information assets. The recommendations in this report are defined in phases that are based on industry recognized best practices and our 25+ years experience in supporting municipalities move towards managing records in physical and electronic formats.

During the preparation of this report, the Covid-19 pandemic had already begun. The impact of this report, while not intended to be a driving force for why, only highlighted the need to implement the recommendations within this report.

Although the original title of this report was: Electronic Document and Records Management Assessment (EDRMS), at the recommendation of The InfoPros, the title was changed to Information Management Assessment. Since the Municipality currently does not have an EDRMS in place, we felt the change in title was more aligned with the objectives of the engagement which was to assess the Municipality's records and information management practices, identify gaps related to the current practices and lastly, to define a high-level strategy and plan to move towards digital information management. Lastly, it should be noted that within the industry, terms such as Enterprise Content Management (ECM), Electronic Document and Records Management Solution (EDRMS) and Records Management (RM) are considered to be outdated as they focus on specific assets. The terms Information Management or, Intelligent Information Management are modern terms used today as it is meant to focus on managing information assets, regardless of their format and their point and time within the lifecycle.

2. REPORT FORMAT

This report has been organized into the following topics for ease of reference:

1. Records Management Program;
2. Physical Records Management;
3. Collection, Access, and Protection of Information; and
4. Information Management Technologies.

Each topic is further segmented into the following sections:

- **DESCRIPTION:** this section defines the topic.
- **BEST PRACTICE:** this section describes recognized approaches and/or procedures that are widely accepted as being correct or most effective in the topic area.
- **OBSERVATIONS:** this section summarizes “current state” findings as they relate to the topic area and highlights gaps from best practices when identified.
- **RECOMMENDATIONS:** this section details the Information Professionals advice in the topic area.

3. SWOT ANALYSIS

Strength, Weakness, Opportunity, and Threat (SWOT) Analysis is a recognized framework for evaluating the current state, of a given area of practice, and aiding in planning activities.

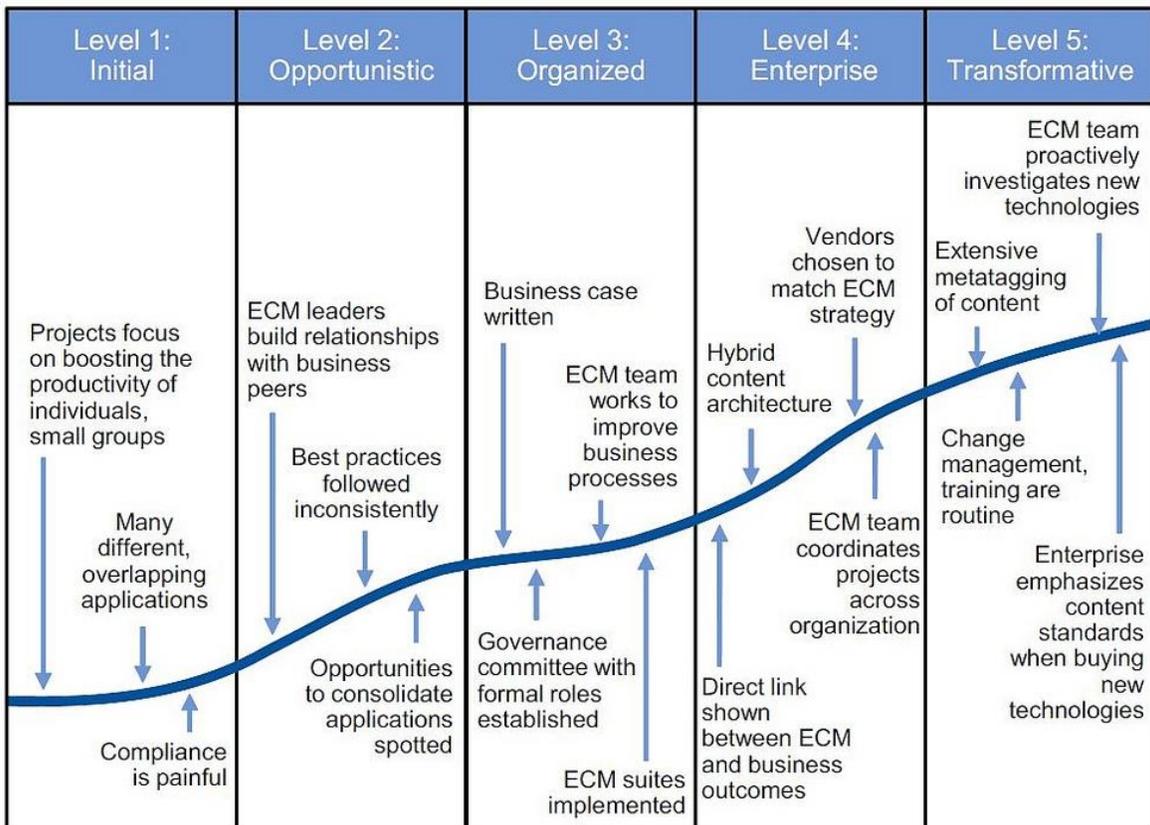
For the purposes of this engagement, the SWOT analysis was used as a strategic planning technique to help the Municipality identify key priorities for action and prepare strategic options to manage potential issues and risks.

STRENGTHS	WEAKNESSES
<ul style="list-style-type: none"> • Open to Change • TOMRMS Classification Structure • Current FOI Request Process • Investment in M365 	<ul style="list-style-type: none"> • Policies and Procedures • Lack of IM Governance • Search and Retrieval of Information • Lack of Records Management Resources • e-discovery Capabilities • Remote Access to Information • Connectivity • Prioritization of Information Management • Lack of dedicated IM Budget • Records Disposition
OPPORTUNITIES	THREATS
<ul style="list-style-type: none"> • Redefine and Modernize Records Management Practices • Redefine Business Processes • Leverage Investments in Existing Technologies • Implement New Records Management Team 	<ul style="list-style-type: none"> • Network Drives Structure • Non-compliance with Legislation • Versions/copies of Records • Lack of Policies and Procedures • e-discovery to Support FOI and Litigation • Physical Management Practices • Information Management Resources

4. GARTNER EIM MATURITY MODEL

While there are numerous Information Management maturity models available today, the Information Professionals selected Gartner's Enterprise Information Management (EIM) Maturity Model because it is well-recognized, well-respected, and broadly used in the industry today. The Gartner model provides a meaningful framework for assessing organizational information management capability and a roadmap to achieving advanced information management proficiency.

The model is comprised of five levels of maturity: initial, opportunistic, organized, enterprise and transformative. For each level, the framework outlines six components required for effective information management: business focus, information governance, user experience, organization, process, and technology.



Source: Gartner (January 2013)

Figure 1 - Gartner ECM Maturity Model

Using Gartner's model, the Information Professionals assessed the Municipality's information management maturity level to be Level 2 – Opportunistic, based on the following:

BUSINESS FOCUS

- An awareness that an Information Management (IM) strategy is needed.
- Limited corporate knowledge of the full breadth of Enterprise Content Management (ECM).

INFORMATION GOVERNANCE

- Significant volume of information exists and is unmanaged.
- Limited ability to manage all corporate records in accordance with Bylaws.

USER EXPERIENCE

- Lack of awareness to advance maturity.

ORGANIZATION

- An established governance committee to support enterprise content management.
- Alignment of IM objectives between IT and business departments.
- Lack of defined processes for managing content beyond current state.

PROCESS AND TECHNOLOGY

- Lack of automated information management processes.

Level 2 organizations should strive to evolve information management policies, processes, and procedures and establish required technology framework to provide for the consolidation of information assets, improving both information governance and compliance capabilities.

5. INFORMATION MANAGEMENT PROGRAM

DESCRIPTION

A comprehensive Information Management (IM) Program is a co-ordinated set of policies, procedures, human resources, and systems that are required to effectively manage corporate information assets (records).

In partnership with the Municipality, the Information Professionals reviewed and analysed the Municipality's Information Management Program, including by-laws, policies, physical records management practices, organizational structure, and systems (e.g., network drives, CK Central, Outlook and other applications and services). In addition, more than 95+ online survey responses and 25 division interviews and were conducted with organizational stakeholders. The surveys and interviews focused on the following:

- Departmental Business Functions.
- Information management practices.
- Information management technology(ies).
- Information management challenges.
- The Municipality's records management by-laws, policies and procedures.
- The Municipality's use of The Ontario Municipal Records Management System (TOMRMS) as its file plan and retention schedule.

BEST PRACTICE

There are commonly six foundational elements to a best-practice-based IM Program:

- Information Classification Scheme
- Records Retention Policies and Schedules
- Dedicated Records Management Personnel
- Records Management Technology(ies)
- Disaster Prevention & Recovery Planning
- Records Disposition

INFORMATION CLASSIFICATION SCHEME

Information Classification Schemes are the foundation an effective Information Management (IM) program. They should be viewed as the corporate standard upon which all departmental information handling practices are based. In a corporate-wide

system, deviation from these standards is not permitted. Users should not be permitted to add or modify classification categories to make the structure unique to their department. Nor should they choose to retain information for more or less time than indicated in the retention standard. Where the corporate standard does not meet user needs, a coordinated approach is taken to modify and update the standard, ensuring that all changes are reflected across the enterprise. No department will use all categories or elements identified in these tools. In the ideal situation, each department or user group is provided with a subset of only those categories and information that they use on a day-to-day basis. This is often referred to as a departmental file plan.

Best practice requires that corporate information holdings are identified by a hierarchical structure – based on corporate functions and activities. The structure should be simple, with as few levels in the hierarchy as feasible to meet user needs. Each category should be mutually exclusive and defined in scope notes to identify what is included (and in some cases, excluded) from the category. Since retention requirements are dictated by the content of a record, the retention and content category are often directly linked. The structure must be consistently applied, regardless of the media in which the information is stored.

INFORMATION RETENTION POLICIES AND SCHEDULES

Well documented IM policies and retention schedules are essential elements of an effective IM Program as they stipulate how long information assets are managed throughout their lifecycle. As such, establishing clear accountability for information management is essential to:

- Defining authority, responsibilities, roles, and expectations.
- Maintaining consistency within an organization.
- Achieving transparency.
- Managing risk.

Effective IM policies and procedures acknowledge that information assets have evolved from traditionally physical formats to increasingly electronic formats, including text messages and content shared on social media platforms.

In the event of litigation, proving that documented policies and procedures are followed supports the admissibility of evidence by establishing that the information is used and relied upon in the course of business. Consistent records management practices

according to these documented policies and procedures is essential for both short and long-term information retrieval, legislative compliance, and risk management.

Every corporation is challenged with managing all information under a single policy to account for and properly organize this deluge of data captured (paper, electronic, audio, video, etc.). Social media presents a significant challenge for corporations, as it often challenges the traditional definitions of “what is a record.”

DEDICATED RECORDS MANAGEMENT PERSONNEL

While there is no recognized best-practice for the composition of a information management team it is generally accepted that at least some dedicated personnel are required to effectively manage enterprise information. In an organization the size of the Municipality of Chatham-Kent, Information Management personnel should consist of the following (at a minimum):

- An Information Management steering committee consisting of an executive sponsor and key stakeholders from Information Management, Information Technology, and each of the Municipality’s departments.
- Three dedicated information management roles: Information Management Specialist, Information Architect, Privacy Coordinator
- A network of records coordinators to liaison between Information Management staff and their departments.

INFORMATION MANAGEMENT TECHNOLOGY

Information Management Technologies today extend beyond traditional Enterprise Content Management (ECM). According to the Association for Image and Information Management, Intelligent Information Management (IIM) is a roadmap that provides the following key capabilities:

- **CONTENT SERVICES:** A flexible and modular approach that utilizes content and information wherever and whenever it is needed, independent of where it is stored.
- **PROCESS SERVICES:** Tools that can be delivered with the simplicity of an app, but within a framework that allows the business to remain in control.
- **ANALYTICS SERVICES:** Automated tools to prepare all information – both structured and unstructured -- for machine learning.

The term services is intentional, because a modern enterprise must be able to link these capabilities together on the fly to respond to a continually changing business environment.

However, transforming business (and the term ECM) has never been about the technology itself; but rather, it has always been about the business improvements organizations want to make, and the many facets of managing the lifecycle of information across an enterprise, that enable organizations to make the business improvements.

DISASTER PREVENTION & RECOVERY PLANNING

The management of vital records should be included as part of the Municipality's disaster prevention and recovery planning. Beginning with the identification and protection of records containing information that the Municipality may need to conduct business under emergency operating conditions or to protect the legal and financial rights of the community it serves. Municipalities need to determine their most critical functions and identify the information needed for the performance of those functions. Finally, Municipalities need to develop a plan of action to respond to emergencies or disasters that may damage records and to provide for the recovery of needed information, regardless of the medium of the records. Municipalities should keep in mind that both vital records and records disaster recovery programs occur in the context of emergency preparedness.

INFORMATION DISPOSITION

Information disposition is a critical element of Information Management Programs and is the final operational action taken in the information lifecycle. Disposition may include the destruction of information or the permanent preservation of information. The volume of digital information that is available for disposition or destruction continues to grow as information professionals are faced with the ongoing challenge of carefully planning and executing disposition. The automation of routine processes such as disposition adds strength to existing information management programs, even when they are challenged by auditors or regulators.

The goal of automated information disposition should be based on the principle that an electronic record is destroyed as soon as it satisfies its retention period set by the Municipality's approved retention schedule. In traditional Information Management programs, manual processes are used to eliminate stored records at the end of their retention periods.

Whether automated or manual, information disposition should include all previous versions. Information and the types of media that support them must be entirely destroyed so they cannot be reconstructed. In the best-case scenario, a Municipality can require complete, irrevocable destruction of certain types of records or forensic deletion. Forensic deletion takes more time, care, money and diligence, but it may be a requirement for the most sensitive records.

OBSERVATIONS

INFORMATION CLASSIFICATION SCHEME

The Municipality leverages The Ontario Municipal Records Management System (TOMRMS) for its information classification scheme. In line with best practices, TOMRMS includes high-level functions and activities, scope notes, retention periods and references to applicable legislation which is updated annually. With more than half of Ontario municipalities using TOMRMS, it is currently considered the standard for managing municipal records within the province.

TOMRMS has not been consistently implemented across all departments and where it has been implemented, its application has been limited to the management of physical (paper-based) records. That said, most departments have discontinued the management of physical records which implies that both physical and electronic records are not being effectively managed within the Municipality.

Importantly, employees at the Municipality have not received records management or TOMRMS training in more than 15 years. A lack of ongoing training results in inconsistent records management practices and a missed opportunity to train new employees. Lastly, records and information management practices have evolved substantially over the last 15 years which means the Municipality's practices are outdated and not aligned with best practices.

INFORMATION RETENTION POLICIES AND SCHEDULES

During its detailed analysis, The InfoPros noted that 50% of survey respondents were not aware of any specific records management policies or procedures. Since one of the most important considerations regarding the way in which we communicate and share information is evolving from mostly physical formats to increasingly more electronic formats, including text messages, emails and content created or shared on social media or other platforms, the Municipality needs to address answering the fundamental questions: definition of a record, employees responsibilities and how should employees manage records and more broadly, information. Most municipalities are challenged with managing all information under a single policy to account for and properly organize this deluge of data captured (paper, electronic, audio, video, etc.) however, it is vital to the fidelity of information management programs that policies and procedures provide the necessary governance.

DEDICATED INFORMATION MANAGEMENT PERSONNEL

The Municipality's Information Management practices are overseen by the Municipal Governance/Clerk Department; however, individual departments have established their own individual practices. The lack of a dedicated records management team that can provide guidance and support on the management of information to Departments across the Municipality has resulted in non-compliance with applicable legislation, a growing volume of information and the inability to conduct e-discovery to respond to FOI requests or potential litigation.

Information management is currently the responsibility of each individual Department. During the stakeholder interviews, the InfoPros observed that many Departments were concerned about not having the necessary resources to apply retention periods (both physical and electronic) in a timely manner, and longer term they're concerned with the potential of not having enough space for offsite storage of inactive physical records.

At this time, electronic records management advice is not being provided.

INFORMATION MANAGEMENT TECHNOLOGY

Like many corporations, the Municipality is currently facing information management challenges associated with a growing volume of electronic documents and records residing on network drives and email messages with attachments in a largely unmanaged state. During the recent Covid-19 pandemic, access to corporate records added to the challenges of being able to support employees working remotely.

The majority of the Municipality's corporate records reside on network drives. Multiple versions of documents, multiple folders and subfolders and inconsistent naming conventions contributes to poor search and retrieval capabilities and with no ability to add metadata to documents or apply the required retention periods to them.

Email

During a stakeholder interview, The InfoPros observed that the management of email messages across Departments presents several risks to the Municipality's information management program and perhaps one of the highest risk factors for ensuring a timely response to FOI requests and/or supporting litigation matters. Most Departments use Microsoft Outlook as a repository of corporate information and the volume of corporate records and documents is growing exponentially. The risks of managing email messages within Outlook are as follows:

- Inability to share/collaborate with colleagues;
- Lack of standard naming conventions, structure;
- Multiple versions of email messages with attachments being managed in several email inboxes;
- Inability to perform effective search and retrieval;
- Inability to efficiently apply retention and disposition to email messages and attachments that have reached their disposition.

DISASTER PREVENTION & RECOVERY PLANNING

During the stakeholder interviews, the InfoPros observed that many Departments were concerned that there is no specific plan for the protection of information assets. As Information management is currently the responsibility of each individual Department, there is no consistent plan for the identification or protection of information in the event of a disaster.

INFORMATION DISPOSITION

Regular, planned disposition is a critical element of an Information Management Program as it protects Municipality's reputation and mitigates any risks of having to produce inactive records to respond to information access requests or litigation matters. Additionally, it's an important step that ensures that storage space is being used efficiently. In the absence of dedicated records management personnel that oversees information management disposition, the Municipality will face risks to support effective decision-making and the ability to conduct a proper e-discovery.

RECOMMENDATIONS

RECORDS INVENTORY AND CLASSIFICATION

1. The Information Professionals recommends that the Municipality reintroduce and redeploy TOMRMS, across all departments, for the management of BOTH electronic and physical content. Currently, TOMRMS has only been applied to physical information assets and not electronic information. This reintroduction could be used as a way to re-organize and clean up network drives.
2. The Information Professionals recommends that the Municipality deliver TOMRMS training to all employees as part of the implementation. As training was provided more than 15 years ago, the reintroduction will ensure that there is consistency in its use and application to information assets in all formats.

REVIEW EXISTING CLASSIFICATION STRUCTURE

Departments have been using naming conventions and terminology that varies across the Municipality. To ensure that the structure used across the Municipality accurately reflects the current state, the record management team could conduct a comprehensive and systematic review of the elements of the TOMRMS classification categories and how they are used or applied in each department. Where a category is used by more than one department, it will be important to validate the terminology with all users and achieve consensus on how to describe the included records. The category names and scope note definitions in TOMRMS should be updated as needed. Although the terminology can be updated, Information Management must ensure that any changes to scope note descriptions includes the type of information assets in the category does not impact the retention that should be applied.

VALIDATE RETENTION SCHEDULE

It is quite conceivable that not all departments are adequately engaged in or focused on information governance requirements and are not aware that retention timeframes can be modified if business needs justify doing so. Rather than relying on departments to request a change to the retention timeframe or respond to communications asking if changes are required, the Municipality should incorporate a proactive process that engages departments and confirms the adequacy of the retention timeframes as part of

each Retention By-law update. Any deviations from the recommended retentions in the TOMRMS update should be justified and documented.

DEVELOP NAMING CONVENTION STANDARDS

Develop a naming convention standard to further clarify options and assist users in naming documents and folders. As part of these refinements, the use of abbreviations should be strongly discouraged, and the focus shifted to the creation of shorter titles using fewer elements in the title and standard version identification.

Naming conventions are standard rules applied to electronic documents and folders. Naming documents consistently, logically and in a predictable way distinguishes them from one another and facilitates their storage and retrieval.

FORMATTING BEST PRACTICES

- Avoid the use of symbols, e.g., ~ " # % & * : < > ? / \ { | }.
- Hyphens, underscores, and spaces are permitted.
- Avoid using Personal Identifiable Information such as date of birth or Social Insurance Number.
- Avoid repetition and redundant words in folder and file names.
- Avoid using acronyms or abbreviations.
- Do not use words that are excluded from searches, e.g., the, if, but, so, for, etc.
- Keep document names short, but meaningful.
- Ensure the document name accurately describes the content of the document.

Benefits

- Creates uniformity in naming electronic documents.
- Enables accurate retrieval.
- Decreases the amount of time spent finding information.
- Eliminates storing duplicate items, especially duplicate items with different names.
- Ensures files are easily distinguished from one another.

Dates

Dates are not required since it is an attribute that is often captured by an Electronic Documents Records Management (EDRMS) solution as metadata. When a date is

necessary (e.g., meeting minutes and agendas) use a hyphen to separate the year, month, and day, e.g., YYYY-MM-DD.

PROVIDE NAMING CONVENTION STANDARDS TRAINING

Brief all staff on the use of the naming convention as part of ongoing Records Management communications and training.

Achieving consistent and standardized file and folder naming is difficult when relying on individual users for naming unstructured, subject-related documents. When defining naming conventions, users should be involved in defining the standard, trained and its use encouraged through regular monitoring and follow-up. The current naming convention should be reviewed to provide additional direction for formulating the title more clearly. For example, users could be instructed to use the most important search term first and to limit the length of the title by not including indexing terms in the document name. At a minimum, abbreviations should be intuitive, commonly used by many users, and included on a very short list of accepted terms that can be easily remembered without referring to a list.

While version control is not required for all record types, where it is appropriate and consistently applied, it is a major improvement to records management and accessibility. The identification of how many and which versions of any record that must be retained after the document is finalized can vary widely depending on the type of record and should be centrally determined and implemented, rather than left to individuals to decide. Since lengthy titles are an issue, the standard for versioning could be shortened to “v” from “ver”.

An EDRMS information architecture (metadata) can often replace elements of naming conventions such as version, however, the Municipality would still realize immediate benefits of defining and adopting a naming convention as it will improve recordkeeping practices such as search and retrieval and content identification.

RECORDS RETENTION POLICIES AND SCHEDULES

The Municipality should prioritize the definition of corporate records and employee responsibilities for protecting and managing them.

Most municipalities are challenged with managing all information under a single policy to account for and properly organize this deluge of data captured (paper, electronic, audio, video, etc.) however, it is vital to the fidelity of records management programs that policies and procedures provide the necessary governance.

While some of the important responsibilities can be found in various policies across the Municipality, The InfoPros recommends developing additional policies to further define corporate objectives relating to the key aspects of the Records Management policy.

The Records Management policy often requires more granular policies to further define the Municipality's expectations. In addition to privacy and retention policies that already exist, additional policies should be considered regarding, but not limited to the following:

POLICIES

REVISE RECORDS MANAGEMENT POLICY

- Revise the existing records management policy by referencing the TOMRMS file plan and retention schedule instead of adding it as an Appendix.
- Revise the existing information management policy by referencing the TOMRMS structure to manage digital files.

ESTABLISH ELECTRONIC RECORDS POLICY

- Establish the parameters for the use of technologies that enable scanning of physical records or the use of electronic signatures, so that records can be relied upon for their authenticity (e.g., admissible as evidence should they be needed in a court case).
- Define the roles, purposes and use of components such as email, voice communication, instant messaging, cloud storage and social media.

ESTABLISH SECURITY AND ACCESS RIGHTS POLICY

- Establish the expectations regarding records affected by a destruction hold in the event of litigation, regulatory or audit issues; and
- Identify records security and confidentiality.

PROCEDURES

REVIEW EXISTING PROCEDURES

- Clearly identify the target audience for each procedure to ensure that users, departmental records liaisons, and records practitioners can easily access appropriate documentation.

ESTABLISH REVIEW SCHEDULE

- Establish a review schedule for all procedures to ensure that their ongoing validity is assessed on a regular and cyclical basis.

CONSIDER PROCEDURES REQUIRED TO SUPPORT EDRMS IMPLEMENTATION

CKCentral should be leveraged as the platform to ensure that staff are able to locate the current and official versions of procedures and to ensure that staff are not relying on outdated physical copies or copies saved to local drives. Required procedures may include but are not limited to those that address:

- Individual employee and stakeholder roles and responsibilities in managing records.
- Interpretation of records management tools.
- How and when to apply the records management tools such as TOMRMS (classification, retention, vital records listing) to electronic and paper records, including email.
- How and when to use information creation and capture components such as the multiple shared drives, email, voice communication, instant messaging, and social media.
- Email best practices and the capture into corporate repositories and classification of records and information.
- Effective use of imaged and electronic records while ensuring suitability for evidentiary purposes.
- Protecting information privacy and confidentiality.
- Effective use of electronic signatures.
- Inactive records storage and retrieval.
- Applying the retention Bylaw to paper and electronic records and maintaining destruction lists of records that have been destroyed.

- Applying destruction holds in the event of litigation, regulatory or audit issues.
- Electronic media destruction.
- Identifying records required for Disaster Recovery and business continuity.
- Vital records capture, protection, and preservation; and
- Records management compliance monitoring.

DEDICATED RECORDS MANAGEMENT PERSONNEL

The Information Professionals recommends that the Municipality considers assigning dedicated Records Management (RM) resources. Assigning dedicated RM resources would allow for greater focus on corporate-wide compliant recordkeeping practices through the broader provision of RM. Additionally, the deployment of the EDRM solution across the Municipality will raise awareness for information management practices that will require ongoing end user engagement and support, maintenance, and auditing to ensure the proper classification of records and their eventual disposition.

DISASTER PREVENTION & RECOVERY PLANNING

The Information Professionals recommends engaging an offsite storage provider to manage physical records. Offsite storage improves the storage conditions, minimizes risks of floods or damage, improves unauthorized access and reduces resource requirements. Additionally, the InfoPros believes that over time, the benefits will outweigh the risks that the physical records are currently exposed to.

RECORDS DISPOSITION

Dedicated IM resources responsible for the oversight of disposing inactive records that have extended their retention periods is an important step to ensure effective information management and compliance with legislative requirements. Additionally, by completing a thorough disposition, the Municipality protects its reputation and mitigates any risks of having to produce inactive records to respond to information access requests or litigation matters.

6. PHYSICAL RECORDS MANAGEMENT

Physical Records Management provides the mechanism you need to manage any type of physical media, including paper documents, folders, boxes, cartons, tapes, microfiche, and many more. Physical records management systems are considered outdated, costly, time consuming to manage, and require continuous maintenance and support. However, Corporations continue to manage records in both physical and electronic formats. To ensure compliant recordkeeping practices, Corporations must ensure that the management of physical records is consistent with defined standards to ensure their protection and timely disposition.

BEST PRACTICE

Corporations generate both physical and electronic records. An efficient records management program manages records – regardless of their format – from creation through to disposition. The following best practices crucial to the management of physical records are as follows:

INDEXING AND CATALOGUING

The effectiveness of physical records management is dependent on how easily both active and inactive records can be accessed when they are needed. Therefore, it is essential to put in place indexing and cataloguing procedures to ensure that key information such as: creation date, Department, Function and Activity are applied to boxes and folders. Poor indexing and cataloguing can contribute to poor search and retrieval and the inability to apply retention periods in a timely manner.

OFFSITE STORAGE MANAGEMENT

Although many corporations choose to store their inactive physical records onsite or in their own offsite facility, best practices suggest considering offsite storage providers. Often, a corporation's facility for managing inactive records means poor conditions such as humidity, dust, risks of floods and unauthorized access. Offsite storage providers ensure that physical records are stored in a temperature-controlled environment and in a secure facility. Additionally, most storage providers can offer tools such as online searching for inactive physical records and manage the disposition of records. Often, these additional services mean that over time, corporations are saving money while mitigating risks.

RECORDS ACCESS MANAGEMENT

Assigning accountability to a designated resource within Municipal Governance Services is important to ensure the management of physical records. As the primary point of contact, the resource develops procedures for archiving, indexing, and retrieving physical records.

DESTRUCTION AND ARCHIVING

Ensuring that records are disposed of or transferred to the Archives in a timely manner ensures that storage costs are managed.

OBSERVATIONS

During the stakeholder interviews, the InfoPros noted that the Municipality provides some physical storage for inactive records including electronic media, art, and artefacts in several storage rooms in various areas of the Municipality. Stakeholders indicated that over time, the physical space is being overused and not adequate to protect corporate records.

The current inactive file rooms are beyond capacity. As a result, many departments are keeping inactive records in their file cabinets or in boxes stashed in their own Departments.

In addition, there is no dedicated holding or reception/accessioning area for records and artefacts. In our opinion, this potentially poses a risk of boxes and their contents getting mixed up and, if there are files or boxes being received for storage at the same time as files or boxes are being processed for destruction, it is possible that the wrong records could be destroyed inadvertently. Lastly, the InfoPros noted that records of enduring value are being managed in the same physical location as administrative records. Records that have enduring value should be stored in an offsite location and from unauthorized access to ensure long-term preservation.

RECOMMENDATIONS

REVIEW INACTIVE PHYSICAL RECORDS

A comprehensive review of existing inactive physical records stored both onsite and in offsite storage facilities will uncover records that have possibly extended their defined

retention period and/or provide an opportunity to apply additional metadata to improve future requests for access to inactive records.

CONDUCT REGULAR INACTIVE RECORDS DISPOSITION

Regular disposition of inactive records that have extended their retention periods is an important step to ensure that storage space is being used efficiently. Additionally, by completing a thorough disposition, the Municipality protects its reputation and mitigates any risks of having to produce inactive records to respond to information access requests or litigation matters.

ENGAGE OFFSITE STORAGE PROVIDER FOR MANAGEMENT OF INACTIVE RECORDS

Engaging an offsite storage provider to manage physical records improves the storage conditions, minimizes risks of floods or damage, significantly improves unauthorized access, and reduces resource requirements. Additionally, the InfoPros believes that over time, the benefits will outweigh the risks that the physical records are currently exposed to.

7. COLLECTION, ACCESS, AND PROTECTION OF INFORMATION

Municipalities in Ontario are governed by the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA). MFIPPA provides limitations on the way the personal and otherwise confidential information is collected, used, shared (disclosed), retained and eventually, disposed.

In addition to meeting compliance requirements, a sound privacy program is important for ensuring municipal accountability and transparency, which can have a positive effect on public trust in the municipality. Through the consistent application of well-informed and well-communicated privacy policies and procedures, public institutions can better ensure the protection of their residents and clients from harm. And with real risks like privacy fines and litigation, municipalities would be well served in ensuring that a strong privacy infrastructure exists in their organizations.

Many municipalities face challenges in the development of privacy programs. Typically, municipalities bundle their Access and Privacy obligations, often within the same role. But because of the strict timelines associated with the processing of Access to Information requests, this area tends to get more focus than Privacy. It is often not until a privacy breach has occurred, does the municipality consider all the various elements of a Privacy program, at which point it is often too late to repair the damage that has occurred.

This section outlines the necessary elements for a sound and functioning Privacy program. These elements, when developed and coordinated properly, provide the best defence against the potential harm of privacy risk for the Municipality.

BEST PRACTICE

Best practices for the management of privacy within Ontario municipalities can be found on the Information and Privacy Commissioner (Ontario) website, where best practices and guidelines cover various elements of a privacy program, including Privacy Impact Assessments and Privacy Breach management.

More generally, privacy best practices are drawn from the 10 privacy principles that are the foundation of privacy law. These are:

1. Accountability

2. Identifying Purposes
3. Consent
4. Limiting Collection
5. Limiting Use, Disclosure and Retention
6. Accuracy
7. Safeguards
8. Openness
9. Individual Access
10. Challenging Compliance

Privacy programs should consider all 10 privacy principles for any new or existing programs, processes or projects that contain an element of privacy risk. For example, when considering the development of a new application that may involve the collection and use of clients' personal information, provisions will need to be made to ensure that messaging related to identifying the privacy risks involved in use of the application are considered. The security of the information collected, who has access to it, as well as clients' ability to access their own personal information, are also points that will require discussion.

Finally, any successful privacy program should be built on the principles of Privacy by Design, wherein privacy considerations are built into programs and processes, with the desired effect being operational effectiveness and privacy risk management.

PRIVACY IMPACT ASSESSMENTS (PIAS)

A Privacy Impact Assessment (PIA) is a risk assessment tool that evaluates and makes recommendations to reduce or manage the privacy risks associated with a particular program or initiative. PIAs are a critical tool to ensure that the Municipality is managing privacy risks in a proactive manner and can provide some assurance against the risk for privacy incidents and breaches that may occur in the future.

Ordinarily, the best practice for conducting a PIA is for program staff to engage the organization's privacy lead (or a consultant) to work with the project lead to complete the PIA. Initially, the project lead will provide information about the project or initiative to the privacy lead. The privacy lead will then evaluate the privacy risks associated with the project and make recommendations. Recommendations should be signed off by the highest level of authority associated with the project.

PERSONAL INFORMATION BANK (PIB) LISTING

The Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) requires that every municipality have a publicly available Personal Information Bank. A PIB represents transparency on the part of the municipality, in that it provides an index that members of the public may refer to determine what personal information a municipality has in its custody and control.

PRIVACY AUDIT PROCEDURES

A privacy audit is a privacy risk assessment tool that is often deployed for an existing program or project. Oftentimes an audit is required when a privacy breach has occurred. Privacy audits are a means of ensuring that privacy risks have been identified and remedied, even once a program or process is in place.

PRIVACY BREACH/COMPLAINT PROCEDURES

Privacy breach and complaint management tools are a valuable component of any privacy program. To reduce organizational risk, privacy breach and complaint management should be consistent and well understood. The management of privacy breaches, while not mandated under MFIPPA, are a recognized best practice that shows an interest on the part of the municipality in taking accountability for a breach. Established privacy breach protocols, like those described by the Information and Privacy Commissioner (IPC), aim to ensure that breaches are contained and prevented as much as reasonably possible. Effective privacy complaint procedures ensure a level of accountability to the public and the IPC. Ideally, both processes are captured in forms so that consistency is ensured.

OBSERVATIONS

During the stakeholder interviews, The InfoPros noted that while the Municipality's Privacy Policy has many strengths, it is still considered in a draft format and has not yet been approved or implemented.

Although the above policies form the skeleton of an effective privacy program, there are some gaps that must be addressed if the program is to be effective.

RECOMMENDATIONS

REVISE AND IMPLEMENT PRIVACY RISK ASSESSMENT (PIA) TOOL

The Municipality should review the PIA tool and ensure that roles and responsibilities are clearly defined. It is crucial to ensure that all staff involved in the PIA process understand their role, from the project lead to the privacy lead to the project authority. A proper understanding of roles and responsibilities will ensure that recommendations are followed through, and staff are accountable.

The Municipality should develop an expedited PIA or Preliminary PIA screening tool as well as a comprehensive PIA based on the IPC's guidelines. The current Privacy Analysis Checklist does not provide enough detail to conduct a comprehensive PIA with the potential to identify risks. An expedited PIA or Preliminary PIA will provide for the ability to screen projects based on privacy risks without necessitating the implementation of a full PIA when one is not required. The Municipality can define the difference between a PIA and an expedited or Preliminary PIA, and the roles associated with each to ensure that staff are aware of when to use one tool over another.

ESTABLISH PERSONAL INFORMATION BANK (PIB)

A comprehensive plan to collect a listing of personal information from Municipality Departments and publish that listing on the Municipality website (or other public location) should be created. The PIB requirements should be included in onboarding and ongoing training for staff to ensure compliance. Building a PIB requires the collection of detailed information from every department and area within the Municipality on what personal information each area collects and maintains. This requires cooperation and coordination with all departments.

DEFINE PRIVACY AUDIT PROCEDURES AND TOOLS

Privacy audit process and tools (e.g., forms, templates, roles, and responsibilities, etc.) should be developed to assess and manage privacy risks that currently exist in functioning programs. These processes should be reviewed regularly, as staff and governance structures change. Additionally, an explanation of the Privacy Audit Procedures should be added to the Privacy Policy.

DEVELOP INFORMATION ACCESS AND PRIVACY POLICY

The draft Privacy Policy should be updated and amended to a more generic Information Access and Privacy Policy or Information and Privacy Accountability Policy. A high-level accountability policy emphasizes the responsibility of every staff member to manage information and privacy. The current policy covers collection, use and retention of Personal Information but not disclosure and destruction. The InfoPros recommend this section be added to ensure that all elements of the privacy life cycle are considered, thereby reducing the overall risk to the Municipality.

The Municipality should develop and add several procedures to the policy, including access to information, records management, and those listed above. By addressing some of the gaps in policy and procedures, the Municipality increases the potential for staff to manage privacy comprehensively, thereby reducing risk.

Under “Responsibilities of Employees” the Municipality should develop a procedure that refers to taking Municipality property (e.g., phones, laptops) that are unencrypted and may contain PI off the premises (e.g., meetings, conferences). By clarifying expectations around remote work and using Municipality devices offsite, staff will have a better understanding of the risks involved and their own personal accountability.

The Municipality should add a section regarding IT responsibilities to include Threat and Risk Assessments (TRAs), encryption, auditing, etc. Currently, the Privacy Policy does not mention the role of IT. Particularly when considering potential privacy risks associated with new technology projects and initiatives, it is important that privacy and IT are working towards a common goal. For example, the PIA process should almost always be complimented by a TRA, which is usually conducted by IT.

The Municipality should develop a plan for Senior Management to be Access/Privacy Ambassadors and include Clerk’s team whenever relevant issues arise. This may include official roles on committees, etc. Addressing the important role of privacy in the organization through governance is an effective way to increase staff buy-in of privacy-related initiatives.

DEVELOP FREEDOM OF INFORMATION (FOI) PROCESS MAP

The Municipality should develop an FOI process map to assist staff in understanding their role in the FOI process, with the goal of improved responses to FOI requests. The Municipality should also develop an FOI process map as an Appendix to the policy.

DEVELOP PRIVACY AWARENESS AND TRAINING SESSIONS

A privacy training program for staff should be developed and implemented. Consider regular training in various forums, (i.e., in-person or electronic training modules), and ensure that a test or quiz is completed at the end of the process, to be revisited annually. It is imperative that staff training complement any policy revisions. Training should be presented in such a way as to utilize scenarios that are meaningful for staff and will help them to understand privacy in practice.

The Municipality should develop staff onboarding and offboarding procedure/policies and forms to clearly document the Municipality's expectations of its staff. By setting out expectations related to privacy (and records) management at the onboarding stage, there is a greater chance for compliance. Similarly, by ensuring that processes to capture records occur before someone leaves the organization, the Municipality reduces the risk of missing or losing important records.

The Municipality should develop a communications plan for the roll out of the new policy and training. A communications plan will be critical for the success of the revised Privacy Policy. Because privacy can be an intimidating or inaccessible subject for some, it is recommended that graphics, videos, and interactive tools are deployed as much as possible as a means of engaging and educating staff.

8. INFORMATION MANAGEMENT TECHNOLOGIES

DESCRIPTION

Electronic Document and Records Management (EDRM) is commonly used to describe a suite of integrated information management technologies or content services platforms used to manage, through automation, the capture, storage, security, processing, disposal, and auditing of corporate information assets.

Core capabilities of these systems commonly include:

- Centralized Content repository
- Advanced Search Capabilities
- Metadata Management
- Auditing and Reporting
- Security and Privacy controls

BEST PRACTICE

Many Electronic Documents Records Management / Enterprise Content Management / CONTENT SERVICES offerings are well-established and, as such, the core capabilities listed above have become standard in virtually every option. Today best-practice offerings include functionality that supports:

- Content Intelligence
- Productivity Intelligence
- Security Intelligence
- Process Automation
- Open APIs
- Federation
- Records Management

Gartner defines a content services platform (CSP) as “the foundational component in an organization for the management and utilization of content. CSPs provide a way for employees to retrieve and work with content in a modern, seamless way across devices and organizational boundaries”.

On an annual basis, Gartner produces a Gartner Magic Quadrant for Content Services. This is a culmination of Gartner’s research in the market and intended to provide readers with a view into the relative positions of market competitors. The figure below is Gartner’s most recent, 2020 results.



Source: Gartner (November 2020)

OBSERVATIONS

The Municipality doesn’t use formal document or records management software.

Most of the Municipality’s digital information assets resides on network drives with an estimate of 16.4 TB and 10M Documents.

The Municipality's network Drives do not share a standardized information architecture, multiple versions of documents are being kept, multiple folders and levels of subfolders and inconsistent naming conventions contributes to poor search and retrieval capabilities and with no ability to add metadata to documents or apply the required retention periods to them. Lastly, an inconsistent structure results in a very arduous and manual process to completing disposition.

The Municipality's IT Department estimated that the current volume of email messages is approximately 14 TB (Terabytes) spread across 3,300 mailboxes.

While the total volume is not an immediate concern, the management of email messages beyond their retention periods presents several risks to the Municipality's records management program and perhaps the highest risk factor for ensuring a timely response to FOI requests and/or supporting litigation matters. Microsoft Outlook is often used as a repository of corporate information and the volume of corporate records and documents is growing exponentially. The risks of managing email messages within Outlook are as follows:

- Inability to share/collaborate with colleagues.
- Lack of standard naming conventions, structure.
- Multiple versions of email messages with attachments being managed in several email inboxes.
- Inability to perform effective search and retrieval.
- Inability to efficiently apply retention and disposition to email messages and attachments that have reached their disposition.

Covid-19 highlighted challenges the Municipality faces with supporting employees working remotely.

Like many organizations, the pandemic resulted in quickly redefining key business processes to protect employees and support working remotely. During the stakeholder interviews, The InfoPros discovered that many employees working from home did not have timely access to information to support decision-making. As a result, many departments took it upon themselves to transition to digital information management on their own with no defined processes or direction on where to store these information assets.

RECOMMENDATIONS

The Information Professionals recommends that the Municipality leverage their existing investments in Microsoft 365 & SharePoint Online to implement an Electronic Document and Records Management Solution

At the time of this assessment, the Municipality had begun testing the Microsoft 365 (M365) suite of products. The InfoPros believes that the Municipality should strongly consider M365 as a viable replacement option for the workloads being handled by shared network drives. M365 would provide the Municipality with a Collaboration and Content Management Platform, with seamless integration to Outlook. Moreover, the M365 platform natively provides classification and compliance capabilities that would allow the Municipality to automate several records management processes that currently require manual execution. Finally, M365 is supported by an abundant ecosystem of 3rd party products including Records Management “add-in’s” that would provide the Municipality with advanced compliance capabilities over and above those provided natively by the platform, should those be required in the future. While it is not a recommendation at this time, M365, in combination with a 3rd party Records Management add-in could also be a viable EDRMS.

Easy to use Document Management: Municipalities are seeing the benefits of moving away from shared drives to M365. Often replacing large unwieldy systems which started to become popular 10 years ago, municipalities are seeing the benefits of a more lightweight solution which puts the emphasis on empowering the user and bringing productivity benefits.

The Municipality’s shared drives are not an effective repository for managing records as it contributes to duplication of documents, inefficient search and retrieval and the inability to apply retention and disposition. Empowering mobility, improving search capabilities and simultaneous collaboration across the organization are just a few of the benefits that the Municipality can realize by migrating content from shared drives to SharePoint Online. Newer versions of SharePoint provide native records management features which allows content to be managed using metadata and labels that align to the Municipality’s file plan and retention schedule, TOMRMS.

Collaboration: SharePoint Online provides the ideal way to empower your teams to work together more efficiently and collaboratively. SharePoint can be configured to provide departmental areas and temporary team sites to facilitate collaboration. SharePoint also

fits nicely with other products in the M365 suite like Microsoft Teams and Microsoft Exchange.

System Integration: Organizations often implement M365 as part of a wider solution with SharePoint acting as the document repository for another system. Many organizations are connecting line of business systems to utilize document management within SharePoint. Organizations can also make use of Microsoft [Dynamics 365](#) to implement a Case Management solution where relevant documents are retained within SharePoint Online.

Third Party Add-in Software: Microsoft's mission with M365 is to make it as universally useful as possible. Many capabilities are provided natively that help organizations manage information in a controlled and compliant manner. Some organizations have elected to supplement the native capabilities with a M365, and SharePoint add-in applications specifically designed to address the unique information handling processes of records. These add-in software solutions process content stored in M365 or SharePoint preventing complex data integration scenarios. During the processing of content, specific features are available to compliance managers such as File Plan management, disposition processing and case records handling. These add-in solutions are not targeted at all users of the Office 365 or SharePoint solution, but a small community of clerks, administrators, and managers. These solutions ensure compliance and audit processes are followed.

