

A background image showing a microscopic view of plant cells, likely from a leaf, with clear cell walls and some internal structures. The image is in shades of blue and white, with a soft focus.

Does your Records Management Program Measure Up?

Developing a Records
Management Program that
Supports Compliance and
Reporting

Begin with
the **end in mind.**

— *Stephen Covey*

Session Overview

- As we establish a Records Management Program, have we overlooked the importance of good reporting to showcase our results
- Before we started did we
 - have a plan
 - gather data
 - identify goals
 - Identify which Standards we will adhere to

Agenda

- Introduction
- Strategies
- Conclusion
- Discussion

goal

What if we spent some time on a strategy?

Are the changes able to "take hold" without a way to establish regular measurement

What controls are in place to guide staff on what to do, such as approved policies and procedures



Why it matters

- Experience of creating tools without context
- Case Study – training, Retention Schedules, Policy – implementation starts to fail when there is no overall Program
- Champions
- Limited success when implementing new tools and technology such as ECM implementations

Why it matters

- How will you demonstrate accountability and transparency?
- If the risks are not identified, how can you assist in mitigating them?
- How do you support informed decision making if you are not able to demonstrate that your systems and processes are working efficiently?
- As the types of risks are evolving how can you mitigate them if they are not identified?

Case Study: Establishing a Compliance Program

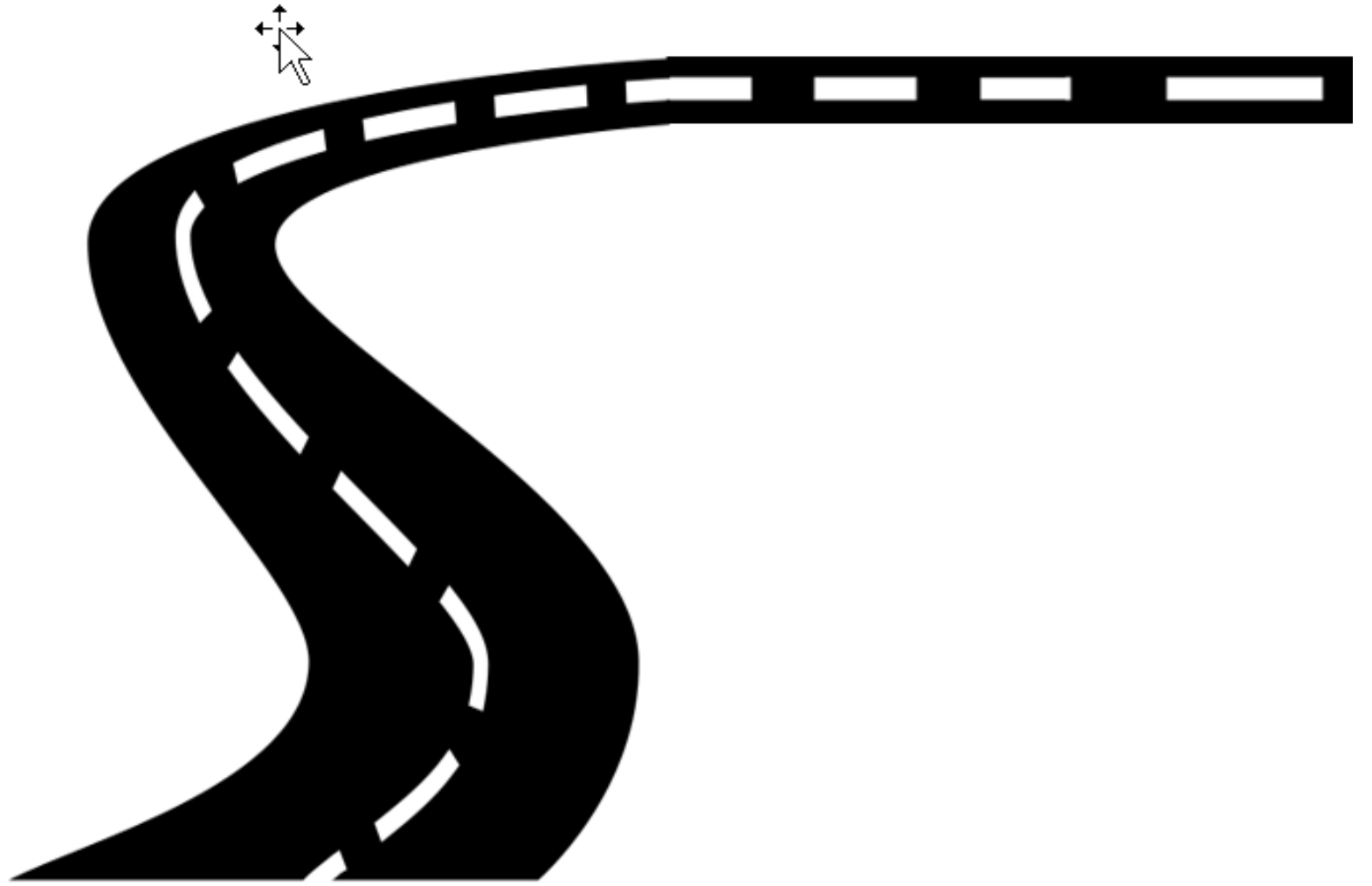
- Goals
- Direction
- Approach – what are you measuring against?
- Risk identification and mitigation
- Perceptions of Program
- Strategy
- Identifying what success looks like
- Champions
- Buy in
- Metrics

Goals

- Are you working **with** the client to identify what needs to be done and why?
- What are your goals?
- Why are you doing this?
- Have you kept the end goals in sight?
- What metrics will be used and how will they be used?



The Path to
Compliance -
Do you know
what Direction
you are Going?



What are we Measuring Against?



Legislation



Regulation



Standards



Governance



Policies

What are you measuring against?

Standards

Canadian General Standards Board 72.34 Electronic Records as Documentary Evidence

ISO 15489:2016 Information and Documentation – Records Management Concepts and Principles

ISO 16175-1 Information and Documentation - Processes and Functional Requirements for Software for Managing Records

ISO 26122 Information and Documentation - Work Process Analysis for Records

ISO 13008 Information and Documentation - Digital Records Conversion and Migration Process

ISO 13028 Information and Documentation – Implementation Guidelines for Digitization of Records

ISO 14641 Electronic Document Management – Design and Operation of an Information System for the Preservation of Electronic Documents - Specifications

Strategy



- What have other jurisdictions done?
- Choose a strategy that will fit with your organization
- Are you carrying a big stick or are you working hand in hand to address concerns / risks?

Compliance in Other Jurisdictions

National Records of Scotland

- <https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011/resources>

NSW Australia, State Archives and Records

- <https://www.records.nsw.gov.au/recordkeeping/advice/monitoring/records-management-assessment-tool>

Public Record Office Victoria

<https://prov.vic.gov.au/recordkeeping-government/learning-resources-tools/information-management-maturity-measurement-tool-im3>

Government of Western Australia

<https://www.wa.gov.au/system/files/2020-06/Consultation%20Draft%20-%20Information%20Management%20Maturity%20Model.pdf>

ARMA International Information Governance Implementation Model (IGIM)

<https://magazine.arma.org/wp-content/uploads/2019/12/Introducing-the-Information-Governance-Maturity-Model-IGIM.pdf>

Features of National Records of Scotland



- The Public Records (Scotland) Act (PRSA) 2011 requires named public authorities to submit a records management plan (RMP) to be agreed to by the Keeper of the Records of Scotland (the Keeper).
- Invitations are sent to public authorities requesting the submission of their RMPs
- Public authorities receive constructive advice concerning on-going developments
- Good resources
- Detailed responses
- Reports are published on the website
- Color coded scoring



Element 11: Audit trail: Tracking and version control

The location of records is known and changes recorded.

The Keeper will expect an authority's RMP to provide evidence that the authority maintains a complete and accurate representation of all changes that occur in relation to a particular record. For the purpose of this plan 'changes' can be taken to include movement of a record even if the information content is unaffected. Audit trail information must be kept for at least as long as the record to which it relates.

This audit trail can be held separately from or as an integral part of the record. It may be generated automatically, or it may be created manually.

Best Practice might include:

- When a physical record is removed from storage, its location is known.
- Records of physical record movements are made and retained.
- Version control is in place.
- Logs of digital record movements and amendments are maintained and are available.

For more information please see our [Guidance Document](#) (571 KB PDF)

National Records of Scotland



PRSA Elements	PRSA Standards	Assessment (Please select which category best describes your branch business area(s) against each element of PRSA. If selecting categories 2 or 3, please outline what provision is in place including any comments/recommendations to meet the required PRSA standard)	Provision in place including comments and recommendations (not more than 200 words per element)
Element 11: Audit Trail: Tracking and Version Control	<ul style="list-style-type: none"> • Uses a document control section to evidence changes to official documents • Ensures that all bespoke information processing systems used in branch have appropriate audit logs/audit trail. • Uses FSS Corporate Memory Capture Procedure or adapts the procedure within branch to capture/monitor the movement of records within branch 	Choose an item.	
Element 12: Records Management Training for Staff	<ul style="list-style-type: none"> • Completes SG eRDM training before gaining access to the system • Completes the annual Civil Service Protecting Information training 	Choose an item.	

Features of NSW Australia



- Good resource materials
- Thorough
- Is available in both Word and Excel
- Looks at elements that may be politically sensitive i.e. do staff feel supported
- Is based on a maturity model with five levels
- Starting in 2022 they will be asking public offices that complete the self assessment to submit their results
- Reports contain many visuals

Features of NSW Australia



RECORDS & INFORMATION MANAGEMENT ACTIONS	RESPONSES	POINTS	SELECT	YOUR SUPPLEMENTARY COMMENTS	EXAMPLES OF EVIDENCE TO JUSTIFY YOUR RESPONSE	REQ	HOW THIS ACTION SUPPORTS THE DEVELOPMENT OF RECORDS AND INFORMATION MANAGEMENT
Q3. Senior Responsible Officer	There is no senior executive oversight of the records and information management function.	1	<input checked="" type="checkbox"/>		> Responsibility assigned in corporate policy on IM/RM.	1.2R	<p>Principle 1: Organisations take responsibility for records and information management.</p> <p>To ensure records and information are able to support all corporate business operations, organisations should establish governance frameworks.</p> <p>Business Environment: If the executives are aware of the benefits and are interested in managing Information Assets well, they will impose accountability.</p>
Is records and information management the responsibility of senior management, who provide direction and support, in accordance with business requirements, relevant laws and regulations? (NOTE: At the organisational level, this question relates to the organisation's Senior Responsible Officer or SRO. At the business unit level, it relates to a senior manager responsible for a defined group of activities and systems.)	Responsibility for the oversight of records and information management is allocated to a designated senior manager, but this individual has little awareness or minimal visibility of RIM practices and performance in the business processes and systems for which they are responsible.	2	<input type="checkbox"/>		> Policy reflects Chief Executive's responsibility to ensure compliance with State Records Act (section 10). > Directives or reports that indicate the extent of SRO oversight of RM performance.	1.3R	
	Responsibility for the oversight of records and information management is allocated to a designated senior manager. This individual understands and supports RIM practices and performance in the high risk / high value information assets for which they are responsible.	3	<input type="checkbox"/>		> Reports to the senior manager, SRO or RIM governance group > Reports or directions from the senior manager, SRO or RIM governance group		
	The designated senior manager directs RIM practices and monitors performance across all the business processes and systems for which they are responsible. The organisation has established a high-level, inter-disciplinary governance group that oversees all aspects of records and information management in a coordinated way.	4	<input type="checkbox"/>				
	The RIM governance group regularly reports to the Executive on RIM practices and performance to drive continuous improvement; identifies information risks and opportunities aligned with strategic objectives; and champions the value of records and information to all areas of the business.	5	<input type="checkbox"/>				

RIM ACTION 19: ACCESS DIRECTIONS

Has the organisation made Access Directions to enable public access to the State records for which it is responsible?

HOW THIS ACTION SUPPORTS THE DEVELOPMENT OF RECORDS AND INFORMATION MANAGEMENT MATURITY:

Public access to State records after 30 years. Each public office must ensure that the State records for which it is responsible and that are in the open access period (at least 30 years old) are the subject of an access direction. This can be either an open to public access (OPA) direction or a closed to public access (CPA) direction. (*State Records Act 1998*, Part 6, section 51(1))

Information Quality: Good information behaviours create high quality information.

Responses (points) (tick one response that applies)	Examples of evidence to justify your response	Key guidance about this topic
<input type="checkbox"/> There are no Access Directions in place. (1)	<input type="checkbox"/> Register of Access Directions	<ol style="list-style-type: none"> Procedures for making access directions Attorney General's Guidelines for making Access Directions
<input type="checkbox"/> There are some Access Directions in place. They are made on an ad hoc basis or in response to an application under s.54 of the Act. (2)	<input type="checkbox"/> Information security attestation	
<input type="checkbox"/> There are Access Directions in place to manage public access for those records identified as State archives which have been transferred to NSW State Archives and Records. (3)	<input type="checkbox"/> Annual reporting (GIPA, PPIPA, HRIPA)	
<input type="checkbox"/> There are Access Directions in place to manage public access for all records that are at least 30 years old, regardless of where they are held or their disposal status. (4)	<input type="checkbox"/> Privacy policy and procedures	
<input type="checkbox"/> Access Directions are made proactively. They are linked to privacy and security controls; and are used to support IT planning and budgeting. Early Access Directions (or similar) have been made for records that can be authorised for public access in less than 30 years. (5)	<input type="checkbox"/> Security policy and procedures	

Your comments:

Use this space to add information about observations, gaps, potential corrective actions; or information about the stakeholders who were consulted in relation to this question. This information is for use by public offices for internal planning and development.

Features of Public Record Office Victoria, Australia




- Under the Public Records Act 1973, the Keeper of Public Records is responsible for the establishment of mandatory standards for the efficient management of public records
- Easy to use
- They have a Recordkeeping Assessment Tool (TKAT) and an Information Management maturity Measurement Tool (IM3)
- Responses are on a five level maturity matrix
- Good resource materials including some specifications regarding technical requirements
- The responses ask for evidence to support the rating.


Features of Public Record Office Victoria, Australia



Back Restart **IM3** Next

Question 1.2: Capability and Capacity

 Is the organisation's information management capability and capacity sufficient to support and develop good information management?

 **EXAMPLE OUTCOMES / EVIDENCE MAY INCLUDE:**
Strategies and/or programs of work have been implemented to address any gaps in IM and data management skills, capability and capacity. The organisation gives priority to recruiting specialists to help develop the organisation's IM and data management capability. The HR requirements for IM and data management are regularly assessed in terms of capacity, skills and knowledge. IM and data specialists are respected professionals who are consulted in the development and implementation of business initiatives. IM and data specialists have been appointed into dedicated roles. There are a sufficient number of staff employed in IM roles in the organisation. IM projects and initiatives are adequately resourced and funded within the organisation.


Choose the maturity level below that best describes your organisation's current situation.

- UNMANAGED: The organisation is either unaware, or has taken no steps to address IM capability and capacity.
- AWARE: The organisation has an awareness of IM capability and capacity, but that there is little practical evidence of action.
- FORMATIVE: The organisation is actively addressing IM capability and capacity. There will be evidence of a planned approach, even if it is not fully implemented in some areas.
- OPERATIONAL: The organisation has completed implementation of planned initiatives in regard to IM capability and capacity, and the initiatives are operating to a reasonable standard.
- PROACTIVE: The organisation has a dedicated commitment to achieving IM capability and capacity through innovation and/or learning based on ongoing monitoring and review.

Unknown/Need to obtain more information

Not applicable to my organisation

Evidence to support selected rating:



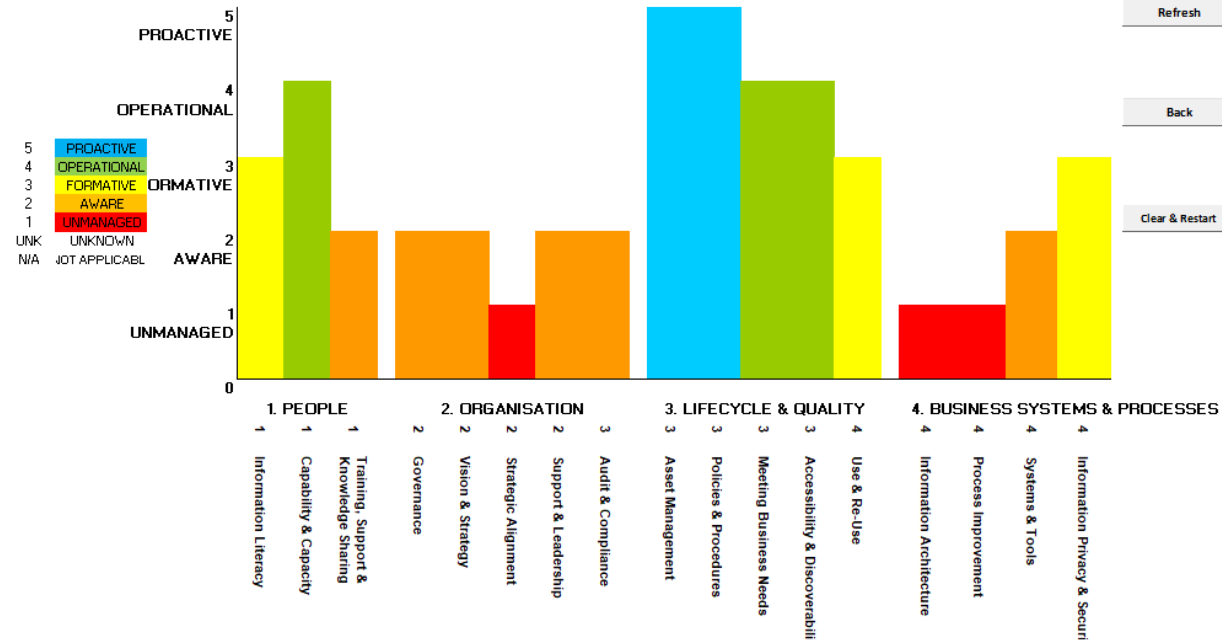
Press [Enter] when you have finished entering evidence information.

◀ ▶ Welcome Instructions Respondent Details **People** ⊕

Features of Public Record Office Victoria, Australia



Information Management Maturity Measurement Results



Print Results

Refresh

Back

Clear & Restart

Displays a Print Preview of the results on this screen, ready for printing.
 *If you want to print the whole assessment, including all questions and results (approx. 24 pages), choose **File > Print** and select **Entire**.

You can return to any page to change an answer or add more information, but you must then click the **Refresh** button to update your results.

Steps back to 'Business Systems & Processes' Sheet. You can also simply select a sheet using the tabs below. If you change any answers, you will need to click the 'refresh' button above to update the results sheet.

Clears all Questions and results, and restarts at 'Welcome' page.

Government of Western Australia



- Information Management Maturity Model (IM₃)
- 12 compliance measures that are required of government organizations
- The data from the completed IM₃ is automatically extracted and reported in an Executive Summary
- Clearly lays out what the assessment tool should be used in conjunction with
- Instructions are brief
- Includes an Improvement plan with a review at year 2

Information Management Maturity Model (IM3)

Principle One: Creation and Management

Level 1 – UNMANAGED	Level 2 – DEVELOPING	Level 3 – OPERATIONAL	Level 4 – FULLY INTEGRATED
1.1 Records of information created, managed and kept in accordance with legislative and business requirements			
<i>Clear business functions are well documented</i>			
<input type="checkbox"/> There is no clear identification of what records of information need to be captured	<input type="checkbox"/> There are some guidelines to identify business functions and the records of information to be captured within individual business units	<input type="checkbox"/> Processes to identify business functions and the records of information to be captured are in place across the organisation	<input type="checkbox"/> The organisation has a clear and comprehensive understanding of its business functions and the records of information to be captured
<i>Everyday business practice routinely incorporates IM policies and procedures</i>			
<input type="checkbox"/> No policies and procedures have been adopted for IM	<input type="checkbox"/> Some policies and procedures for IM are applied in an ad-hoc manner	<input type="checkbox"/> IM policies and procedures are mandated and are being incorporated into business practices	<input type="checkbox"/> IM policies and procedures are routinely updated and incorporated into all relevant business practices
<i>Business Information System (BIS) purchase and design considers IM requirements</i>			
<input type="checkbox"/> The functional requirements of IM are never considered when systems are purchased / designed	<input type="checkbox"/> The functional requirements of IM are occasionally considered when systems are purchased / designed	<input type="checkbox"/> The functional requirements of IM are often considered when systems are purchased / designed	<input type="checkbox"/> The functional requirements of IM are always considered when systems are purchased / designed
<i>All BIS (including legacy systems) and the information they contain are controlled</i>			
<input type="checkbox"/> IM is unaware of what systems business units have / are purchasing	<input type="checkbox"/> IM has identified few systems within their organisation and what records of information they contain	<input type="checkbox"/> IM has identified most systems within their organisation and what records of information they contain	<input type="checkbox"/> Senior management controls an Information Asset Register or equivalent which identifies all systems and the records of information they contain

Government of Western Australia



WA.gov.au

Maturity Rating and Improvement Plan - Compliance Measure 1.1

Maturity Rating	<Formula based on responses above to produce a rating 1-4 ... this links to a field in an Executive Summary >
Key Area for Improvement	<Title only ... this links to a field in an Executive Summary >
Improvement Plans	Free text. Briefly describe any plans for improvement. This field is not included in the Executive Summary but should be completed with as much detail as you think will be useful for your organisation.
Two Year Review – have you implemented improvement plans?	<Yes/No ... this links to a field in an Executive Summary >
Improvement Plans - Implementation	Free text. You may use this space to describe what has been done to implement improvements against the plans. This field is not included in the Executive Summary.

ARMA Information Governance Implementation Model



- Is an aid to bridge the gaps across stakeholders
- Offers a functional approach to IG
- Seven key areas:
 - Steering committee,
 - Authorities,
 - Supports,
 - Processes,
 - Capabilities,
 - Structures
 - Infrastructure
- Builds a common understanding and unified implementation approach

ARMA Information Governance Implementation Model



Other Ideas

- Create your own by adapting from others
- Use a maturity matrix
- Self assessment followed by interviews with key players



Risk Identification

- After completion of the assessment, procedures can be catalogued and evaluated
- Gaps are identified
- Risks are identified and the severity of the risk is determined
- If you identify risks, what are you going to do about them?
- Do you have mitigation strategies and an implementation plan for each risk?



Review and Reporting



- How will you know that you have reached your goals?
- How will you report the information?
- Use of visuals, graphs, colour
- Ability to consume the information quickly

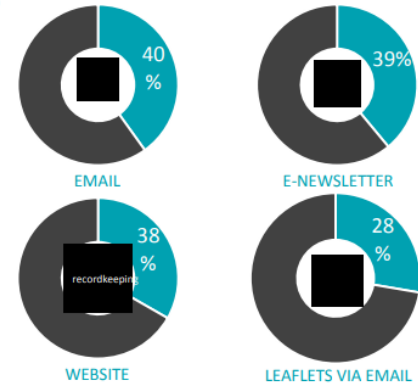
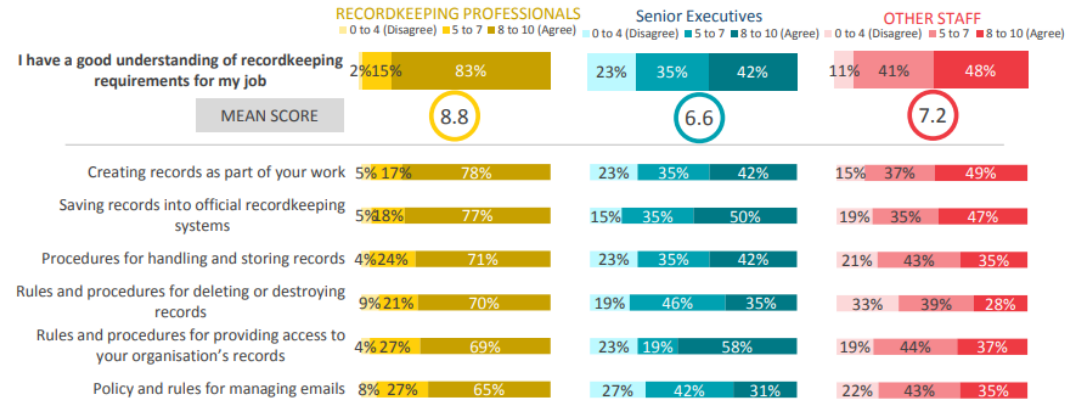
Review and Reporting Examples



Degree of recordkeeping understanding by Job Position

Summary Scorecard

Communication channel preferences by Total Population (scores 8 to 10 – Interested)



Key Insights (2 of 5)

LACK OF SUPPORT

Senior Executives are often seen as a key barrier to implementing and encouraging recordkeeping practices. This lack of support is further evidenced by the IT department's conflicting technology-related interests, despite numerous attempts to educate them regarding their recordkeeping requirements.

As role models in their respective organisations, Senior Executives often regard recordkeeping as 'bureaucratic red tape' and 'archaic'. This lack of support only amplifies the resistance already evident across the wider organisation. As a result, there is a strong desire for SROs to be better supported by NSW State Archives and Records. The SRO's responsibility to carry out their role according to the Act is acknowledged. A possible solution to this strong desire for additional support, is to dial-up communication regarding *how* NSW State Archives and Records currently supports SROs - as it is often found, through the depth interviews, that SROs aren't fully across all the resources and support already available to them.

MOVEMENT TOWARDS A POSITIVE CULTURE

There is clear movement towards a more positive recordkeeping culture, however persistence, time, and the right resources are key. This includes heightening employee engagement, changing mindsets, making use of recordkeeping advocates, and automating systems to streamline activities.

Employee resistance to their recordkeeping obligations has been widely reported by SROs, but many of these SROs have shown determination and willpower to overcome this barrier. They are seeking additional support via ideas, examples, and case studies of organisations dealing with similar challenges. It is understood that NSW State Archives and Records currently provides such resources via multiple platforms - on the website, through forums, and blogs. However, it is apparent that there is low awareness of such resources and therefore there is an opportunity to heighten awareness by reviewing and modifying how these tools and resources are being advertised.

<https://www.records.nsw.gov.au/sites/default/files/Recordkeeping/Benchmarking-Research-Full-Report.pdf>

Addressing Excuses

- Too expensive
- Staff don't have time
- Lack of resources
- Competing priorities
- Public perception if the report is negative
- Hollow facades and window dressing
- Lack of effective measurement tools
- Required activities are viewed as checking the box

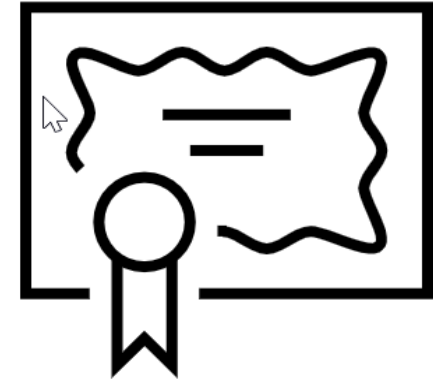
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Program improvement

- Do you have goals for the year for how the Program will be improved/gaps addressed?
- Do you have a strategy for how your Records Management Program will support compliance and reporting?
- Are you measuring the right things?

What do you need to succeed?

- Plan / Vision of the Future State
- Champion
- Executive support
- Buy in
- Budget
- Resources
- Governance
- Metrics
- Reporting to demonstrate the impact of the Program



Discussion



Resources

- Why Compliance Programs Fail—and How to Fix Them <https://hbr.org/2018/03/why-compliance-programs-fail>
- U.S. Department of Justice Criminal Division Evaluation of Corporate Compliance Programs (Updated June 2020) <https://www.justice.gov/criminal-fraud/page/file/937501/download>
- Library and Archives Canada: Governance and Recordkeeping Around the World <https://www.bac-lac.gc.ca/eng/about-us/publications/governance-recordkeeping-world/Pages/default.aspx>
- ARMA International <https://www.arma.org/>

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