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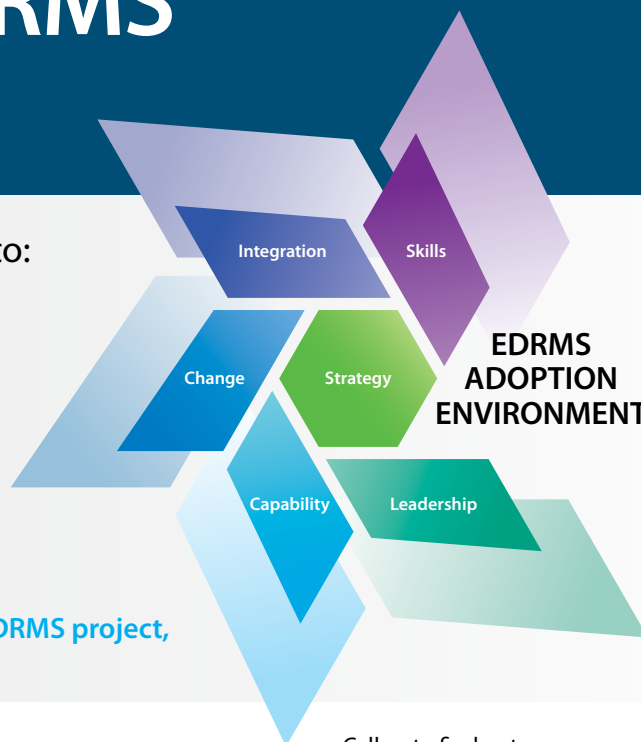
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David Pryde, Chairman of the Board, RIM Professionals Australasia

INFORMATION GOVERNANCE: successful information management into the future

As I'm contemplating what to bring to your attention in this latest 'View from the Chair', I am mindful that it is only a few short months away to our inForum convention in Canberra, with its highly relevant theme of 'Information Governance' – ie, the strategic, high-level decision to assimilate all of the activities associated with good business into managing information like the asset that it is for the benefit of the whole organisation, its customers and stakeholders.

This holistic approach, at least in theory should give practitioners the opportunity to participate at all levels in the strategic design and configuration of the 'corporate memory' rather than asking for permission to make changes to the information architecture. I am very excited that organisations that have adopted 'good' information governance will be better placed to identify and mitigate information risks when aligned to corporate objectives.

"Information governance covers either in whole or in part many of the traditional sub-disciplines related to information management avoiding the compartmentalised thinking that places these disciplines into separate categories or systems."[1]

The need for an enterprise information governance framework in any government department or organisation is never more urgently required than at the planning stage of any technology implementation. How many times have we seen technology projects achieve only marginal success or fail altogether because the client could not specify what they wanted? Suppliers can be equally blamed for supplying products and services to meet specifications they know are incomplete.

Entering into a relationship with a partner organisation (supplier, vendor or professional consultant) is like a marriage that involves a great deal of trust, faith and the sharing of minds, emotions, ideals and knowledge toward a common goal. When this relationship is taken for granted, then cracks will appear in the facade of the project that can be irretrievable if left unmitigated.

I don't have a lot of space to expand on my thoughts this edition but here are my top 7 principles for a successful project marriage:

1 Client organisations need to provide suppliers with an *informed* requirements specification that articulates the reason for the project: the drivers, deliverables, business rules, risks and expected outcomes in a logical and intuitive way.

Bibliography

1 DLM Forum: Information Governance; DRAFT Version 0.3 – What does successful Information Governance across Europe look like? http://www.google.co.nz/url?sa=t&rct=j&q=&esrc=s&frm=1&source=web&cd=6&cad=rja&ved=0CGQQFjAF&url=http%3A%2F%2Fwww.dlmforum.eu%2Findex.php%3Foption%3Dcom_jotloader%26section%3Dfiles%26task%3Ddownload%26cid%3D501_1d6720cd3a63be6a9e22c93025a96d2b%26Itemid%3D150%26lang%3Den&ei=GHZ0UcX4I4WtiQfqmYHQBg&usg=AFQjCNGuPlWJ2eAV9eYIp6p8_qQVjn9ryw&sig2=zmmUYgYQ9N6N9dL5AVyYeA

2 These organisations need to be able to quantify the existing metrics of the enterprise in a way that when combined with the project specification can easily identify gaps between the current and future states.

3 Prospective partners need to be able to understand the needs of the organisation and what it is trying to achieve. Partners who exhibit 'critical maturity' at this point by highlighting gaps or value-adds are more likely to win successful projects.

4 During the analysis period when determining the 'statement of work', treat the project like an ecosystem and identify which piece delivers each outcome and how they work together. Ensure everyone in the team is aware!

5 Identify risks early, build mitigation into the project plan and attribute resources to its achievement.

6 Continuously monitor and review along the process, not just at the end of the project by asking the question – "Am I still fit for the purpose being constructed or has the purpose changed?"

7 Communicate regularly with the project team, partners, steering groups and most importantly staff to ensure everyone is on the same page.

Information governance is going to be a powerful component of successful information management in the future. This is your golden opportunity to find out all about it in Canberra from 8-11 September 2013. I'd love to see you all there.

David Pryde
MRIM

Coming up in the August issue of *iQ*:

More on 'Information Governance'

Articles due: Monday 1 July 2013

WORLDWIDE NEWS

Heiner Affair commissioner seeks wider inquiry

Queensland Child Protection Commissioner Tim Carmody wants to broaden his "Heiner Affair" inquiry's scope in order to continue the investigation amid uncertainty that the historic case involved child sexual abuse, the Brisbane *Courier-Mail* has reported.

Mr Carmody has written to the Queensland Attorney-General, Jarrod Bleijie, asking to continue his extensive investigations into the 1990 shredding of documents from an inquiry by magistrate Noel Heiner into events at the John Oxley Youth Centre in Wacol, Brisbane, that grew around allegations of mismanagement and claims of covered-up sexual abuses.

Mr Carmody said there was a legal argument he should not continue the inquiry unless he was convinced of a link between the Queensland State government response and child sexual abuse. His letter to the Attorney-General commented: "Senior counsel assisting and some of the parties with authority to appear contend that the incorporation of the words 'into historic child sexual abuse in youth detention centres'… is a jurisdictional precondition to the making of findings about 'government responses'," the *Courier-Mail* reported.

During a recent hearing, Mr Carmody suggested the man who has pursued cover-up claims for more than a decade, Kevin Lindeberg, may have 'overreached' over the sexual abuse claims. He said the government may be surprised to learn there was no evidence of sexual abuse, but stressed he had not yet reached a conclusion.

The *Courier-Mail* report added: "Mr Lindeberg has always alleged the 1990 destruction of Heiner inquiry files was a crime that has been wrongly dealt with over the ensuing years. Over time, the Heiner affair has grown to incorporate the abuse cover-up claims. Mr Lindeberg has requested a broader inquiry into the shredding and related matters."

Kevin Lindeberg

Hong Kong Ombudsman orders FoI inquiry

Hong Kong Ombudsman, Mr Alan Lai, has ordered an investigation into the special administrative region's Access to Information Code and government records management systems, the *South China Morning Post* reported earlier this year.

The newspaper reported past calls from the public for enhanced citizens' right to access information but the Hong Kong Administration had consistently maintained the code provided "an effective framework for the public to access a wide range of information held by Government".

The Ombudsman told the *SCMP*: "This Office considers it necessary to look into the standards and practices of the Code, vis-à-vis the FOI regimes in other jurisdictions, so as to determine whether the public's right to access information in Hong Kong is adequately provided for and whether the measures taken are in keeping with modern standards of open and good administration."

Mr Lai went on: "In our direct investigation, we will compare Government's records management system with those in other jurisdictions, so as to find out whether there are systemic inadequacies in Hong Kong and how these inadequacies affect the public's access to information."

UNESCO memory of Maori Court and NZ Springbok Tour

Maori Land Court Minute Books from the 19th century and a documentary film, *Patu!,* on the strongly opposed 1981 Springbok Tour of New Zealand, have been added to the UNESCO Memory of the World New Zealand register for documentary heritage.

Chair of UNESCO'S Memory of the World Asia Pacific Programme, Ray Edmondson, said the minute books and *Patu!* tell stories of events from two powerful periods of New Zealand history, adding: "They still have an impact on society today and are highly regarded sources of research for historians, Maori researchers, educators and many others in the wider community."

The Maori Land Court Minute Books 1862 to 1900 document the early years of the Native Land Courts and record the hearings and evidence given to establish the Native Land Court titles across New Zealand, recording tribal history, *whakapapa* (genealogy) and evidence of *iwi* and *hapu* (tribe & sub-tribe) use and land occupation.

The documentary *Patu!* records events from the 1981 Springbok Tour to New Zealand, from the opinion of those who opposed the tour. Featuring the work of many New Zealand film and documentary makers, it was created by veteran Maori documentary maker, Ms Merata Mita, who died in 2010.

This UNESCO programme sits alongside UNESCO's better-known World Heritage List and Register of Intangible Cultural Heritage. The Memory of the World Programme register is the flagship and promotes the nation's heritage stories to the wider community in New Zealand and overseas.

➲ The Register can be viewed on: www.unesco.org/new/en/communication-and-information/flagship-project-activities/memory-of-the-world/register/.

New experts join NZ Memory of World Trust

Donal Raethel

Tracy Puklowski

Two new Wellington-based experts have joined UNESCO's Memory of the World NZ Trust, Te Papa's Tracy Puklowski and Archives NZ's Donal Raethel, as the trust launches its 2013 appeal for inscriptions to the heritage document register.

Donal Raethel, a Senior Archivist, assists Archives NZ researchers and coordinates touring displays of its heritage holdings like the Treaty of Waitangi and the Women's Suffrage Petition. Tracy Puklowski, Associate Director of Te Papa's Museum of Living Cultures, heads a team developing outreach programmes and activities.

Submissions to the year's Memory of the World Programme close on August 16. The successful inscriptions will be announced in October. The New Zealand Memory of the World Programme, formed in 2010, works in association with the New Zealand National Commission for UNESCO.

➲ For more information and submission details visit the website: www.unescomow.org.nz or contact the Memory of the World New Zealand Committee enquiries@unescomow.org.nz/.

'Dead RM' Randy raises RIM pro hackles

The man who caused an 'RM is dead' sensation around the Australasian RIM a month or so back is Randolph A. Kahn, 'Randy' to his friends, his Chicago company, Kahn Consulting, Inc, and the 'Legal Issues in Records and Information Management' students at his George Washington University courses.

He's the outspoken tweeter @InfoParkingLot; the provocative blogger at *Information Nation* and *Are You Kidding Me?* who posted his eye-catching thesis 'Don't shoot the messenger; records management, as we know it, is dead' (see http://areyoukiddingme.kahnconsultinginc.com/2013/03/dont-shoot-messenger-records-management.html) that got the listserves humming with excited "Yeas" and gritty "Nays". Similar reactions to the *Kidding* blog on-line earned an in-your-face posting from Kahn, 'Stop Whining Already'.

Some listserve lurkers grumbled at the 'RM is dead' posting highlighting the rising dominance of IT in IM, but other commentators were more sanguine. One posted: "Kahn is talking about the evolution of records and information management towards information governance, changing information strategies, and holistic management of all information – not just records. As one of the comments to the blog said: 'Records management must look at contributing to the entire corpus of information'."

Kahn loves to stir up IM with cheerful mockery of old-style record keeping and enthusiasm for the records management new world; new paradigms he calls 'defensible disposition'.

In a message to *iQ*, he posted: "Begging for budget, justifying your meager salary and being viewed as a cost center is so not fun. Imagine being viewed as a business executive who provides real value and makes the company money. Defensible disposition may be your ticket out of the records management ghetto."

Kahn's *Kidding* post describes the new records manager: "She is super smart. She is a business person first and an IT person second. She only inherited records management because of Bob's untimely demise. She will have no problem learning records management. She will bring fresh eyes and not be clouded by the 'old school' ideas of records management past."

Note his character gender choices. 'Bob' is his personification of old-school practitioners. He's joking about Bob's 'untimely' death, too. Actually, he welcomes it.

Randolph A. Kahn

National Archives compiling forced adoption stories for website and touring exhibition

On 21 March 2013, the Australian Government delivered a formal national apology to those affected by forced adoption practices.

It was also announced that the National Archives of Australia would be developing a website and exhibition to record the experiences of those affected by forced adoption and increase awareness and understanding of these experiences in the community.

This was in response to the Senate Community Affairs Committee report into the Commonwealth Contribution to Former Forced Adoption Policies and Practices. It specifically relates to Recommendation 20: that the Commonwealth commission an exhibition documenting the experiences of those affected by former forced adoption policies and practices.

The Archives is now working towards launching the website on the first anniversary of the formal apology in 2014, and opening the exhibition on the second anniversary in 2015. The Archives is also responsible for developing and managing a national tour for the exhibition.

Both projects will provide people the opportunity to tell their stories and help the Australian community to understand and learn from these experiences.

➲ If you have, in any way, been affected by the practices and policies of forced adoption in Australia, the National Archives would like to hear from you: http://www.naa.gov.au/about-us/partnerships/forced-adoptions.aspx

Study finds federal US agencies overspending on records management

Government finance and records professionals cite exponential growth of records as the main culprit for overspending on records management and call for better training as a top solution.

The volume of information federal agencies must manage has outgrown their budgets, challenging the nation's records handlers to control this deluge of information and costing their agencies more and more money.

This is the central finding of a new study from MeriTalk, the US government IT network, and storage and information management services company Iron Mountain Incorporated that asked federal records managers and finance professionals to assess the state of federal records management.

The results show agencies exceed their annual records management budgets by an average of 17%, despite shelling out increasing sums to store and manage mounting volumes of data.

Titled 'Federal records management: Navigating the storm', the online survey asked 100 federal records managers and 100 federal finance professionals in September 2012 to assess their records practices, budgets, opportunities for savings, and views on the future.

Chief among the findings is each federal agency spends an average of US$34.4 million per year on records management, or US$5 million more than budgeted. And according to the results, those sums will only increase. Agencies expect records management spending to more than double to US$84.1 million by 2015 due to an expected 144% increase in records per agency over that period.

The survey revealed that the chief causes of blown records budgets come from:

◆ **Too many records** – A single federal agency currently manages an average of 209 million records; government-wide, agencies manage approximately 8.4 billion records.

◆ **Runaway information growth** – The number of records per agency is expected to grow to 511 million by 2015, an increase of 144% over current records volume.

◆ **Multiple information types** – Agencies increasingly create records in more varied sources and formats. For example,

…agencies exceed their RM budgets by an average of 17%

47% of all records are electronic, while 41% of records are created electronically but managed in a paper format.

◆ **A D-I-Y approach** – 62% of federal records managers use in-house systems, but that may not be the most effective approach, as 60% of federal finance professionals say problems with managing records hinders agency operations.

In addition to the cost and volume pressures of managing records, federal agencies are also racing to comply with the Presidential Directive on Managing Government Records, a government-wide effort to reform records management policies and practices. The Directive, enacted in August 2012, instructs each agency to modernise its records management policies through more efficient operations, including digitising records and establishing a new infrastructure that will minimise costs and promote openness and accountability, which form the backbone of President Obama's Open Government initiative.

"Federal record volumes will only continue to grow, driving up budgets and making it harder for agencies to manage information on their own," said Sue Trombley, managing director of consulting for Iron Mountain. "This growth and the added pressure from the Presidential Directive are combining to make records management very complicated and unsustainable. Most agencies know they need outside help and are looking for alternatives that include the development of a strategic plan, agency-wide collaboration and training, implementing technology solutions, and policy guidance and enforcement all aimed at regaining control for today and the future."

When asked to name solutions for their information management problems, survey respondents cited training (43%), more funding (33%), and greater support for records management from agency leadership (32%). By focusing on those three factors, federal finance professionals estimate saving 24% of their records management budget, and records management professionals estimate the savings at 36%. This could mean an annual savings of $8.3 to $12.4 million per agency and between $330 million and $495 million government-wide each year.

To realise these significant cost savings, Iron Mountain recommends the following building block strategies:

◆ **Make it an executive priority** – Bring together leaders from all functions within the agency, including IT, finance, operations, legal/compliance, and security to help create, implement, and enforce a culture of records and information management compliance.

◆ **Invest in training** – Regular training and education creates a culture of accountability and responsibility for records management, helping to ensure that employees are invested.

◆ **Smart digitisation & timely destruction** – A common mistake when converting paper records to an electronic format is to scan (then save) everything; instead, agencies should consider what records they have, who needs them, for what purpose, and for how long, then digitize those records first and destroy older inactive records no longer needed for compliance or business reasons.

◆ **Where possible, streamline** – Choose process to standardize on for the entire agency, as records management programs have a better chance of success if there is agreement on common policies/practices and schedules for addressing access, retention, and other processes.

➲ To download the full study, please visit www.meritalk.com/navigating-the-storm. For more information on Iron Mountain's services, go to www.ironmountain.com/federal.

⟹

Being digital savvy to preserve government information

David Fricker

The National Archives has launched a new e-learning training module Introduction to digital records, to help agencies be digital savvy when managing government information. This initiative is part of the Archives work to help government agencies implement the Transition to Digital 2015 strategy.

The Transition to Digital 2015 strategy requires that, after the end of 2015, government agencies will manage and keep new digital information and records in digital formats, instead of printing them out. Eventually only digital records will be transferred to the National Archives for storage.

The Creative Australia national cultural policy highlights the role of National Archives as a national collecting institution and its responsibility for ensuring records of government business are kept, preserved and available in the future. The Archives is working to ensure agencies are skilled-up and using the best in digital practices to preserve records.

"The new training module will help people learn how to preserve and manage government information in the digital age – ensuring the records of government business from today will be available for future generations," said National Archives Director-General David Fricker.

Agency staff can access further training options through the National Archives' Digital Edge training programs, or assess their agencies' records health using Check-Up 2.0.

⮑ Further information on the module and other training is available at naa.gov.au.

Survey exposes collaboration challenges for corporate legal professionals

KnowledgeTree, a provider of cloud-based solutions that help companies "rule their documents", has announced the results of a survey that investigated how legal teams work together on business processes and documents. The study polled business users that work on legal documents and discovered that the process of creating and approving team-generated content creates significant inefficiencies.

The survey found that teamwork is critical to legal teams, and documents are central to how these teams collaborate. However, few respondents find the way corporate counsel teams currently manage documents to be effective.

- ◆ Only 24.1% believe it is easy to work on documents as a team.

- ◆ Less than a quarter (24.8%) think it's easy to collect feedback during the draft period.

- ◆ Just 25.6% think it's easy to control changes during the draft period.

- ◆ Only 25.4% think it's easy to control the review process.

- ◆ A slim 24.6% think it's easy to share information between departments.

Corporate counsel teams need to stay in control as contracts are created, edited and reviewed. It's important to be sure that critical agreements are properly vetted and all the appropriate stakeholders have a chance to review. Due to challenges in managing document versions and approval processes, unnecessary re-work results in inefficiencies and lost revenue.

- ◆ 70.5% make 3-5 document revisions.

- ◆ More than half (54.8%) need to frequently verify that documents were already approved by the correct parties.

- ◆ The root cause: The collaboration process is broken, and email is the culprit.

- ◆ 57% still use email to collaborate.

- ◆ 45% share feedback via email during the draft period.

- ◆ Less than a quarter (22.5%) believe the processes are efficient.

- ◆ Real-time co-authoring and collaboration tools bring a structured approach to managing legal documents. However, only 16.3% of the respondents use such a tool and instead struggle with email.

"Legal teams work with hundreds of contracts, agreements, and other documents every week. This survey highlights the fact that legal teams have limited insight into and control of their documents – and hence into how they get work done. By arming teams with intelligence about their documents – from document creation to approval – they can reduce risk and boost productivity," said Daniel Chalef, chief executive officer of KnowledgeTree. ❖

⮑ For more information, go to www.knowledgetree.com.

CONTACT US ✉ If you have any news stories for *iQ*, please contact editor.iq@rimpa.com.au

RECORDS MANAGERS – WHAT ARE YOU THINKING?

RIM is evolving into an esteemed corporate discipline. To guide their companies to that future state, records managers need to have not only that vision of the future, but also the right frame of mind.

By **Craig Grimestad**

It is not easy to be a records manager at this time in history, given the evolution of records and information management (RIM) from primarily the management of off-site storage, to the governance of records, and now to the governance of official records as corporate assets. RIM is destined to evolve into an esteemed corporate discipline that assures that records are managed in a way that provides for efficient business operation, satisfaction of legal and regulatory requirements, and risk avoidance from having too few or too many records – all at minimal cost. Increasingly, RIM requirements and processes will be monitored vigilantly and audited periodically to confirm compliance. RIM professionals will participate in business development, asking questions such as "What information must be captured and in what form will the Official Record(s) be established?" They'll also actively participate in the selection and establishment of business applications, databases, and records repositories, asking questions like "Does the technology facilitate or at least make it easy to store and dispose of Official Records and/or copies?" This is the future of RIM – is that what you're thinking?

Well, you say – "That's not where I live – no, that's not what I'm thinking – I have trouble getting individuals to fill out transmittal sheets, or to place Official Records in the correct repository, or to understand they shouldn't keep every record they ever touched. What else should I be thinking?"

Well, understanding the value of RIM, you are the one best able to guide your company to that future state, even while struggling through the every day issues. So what should you be thinking?

You should be thinking:

◆ I have an essential role to guide and move my company forward in the identification, selection and implementation of RIM requirements, tools, and processes.

◆ I have knowledge and understanding that needs to be absorbed and acted upon by employees, not just communicated.

◆ I need to be a visionary, teacher, coach, motivator, facilitator, guide, encourager, problem solver, and helper.

◆ Implementation must be complete and comprehensive. Finding an old copy of a record in an obscure location, is no different than finding the original posted on a bulletin board. It does *no good* to be rid of *almost* all copies.

◆ No exemptions from requirements. Exceptions may be given for specific reasons, and for specific periods of time, with identified corrective action, but *no exemptions*.

◆ We don't do RIM to satisfy legal and regulatory requirements. RIM requirements, tools, and processes are efficiency improvements that enable the company to be more profitable and the employees more productive. We do RIM to efficiently run the business, make money, and satisfy our customers. Along the way, we satisfy legal and regulatory requirements also.

Implementation of a comprehensive RIM governance program is a cultural change – culture shock for some. It changes what, and therefore who, is valued. Commonly, individuals are found within companies that have 'kept it all' and gained a reputation as the 'Font of Knowledge'. With the arrival of professional RIM management, these employees are required to give up their personal historic archive, placing Official Records in an authorised repository, and disposing of convenience copies when they have no personal need of them or the retention requirement has passed. Cultural change is often the cause of pushback and resentment. When individuals argue or complain about the smallest details or insignificant points – look to the impact on them or their job for the real source of difficulty. ❖

ABOUT THE AUTHOR
Craig Grimestad is a senior consultant with Iron Mountain Consulting. His specialty is designing RIM core components with a sub-specialty for RIM auditing. Craig holds a Masters of Science degree in Engineering and was the records manager for the Electro-Motive Division of General Motors where he participated in the development of the GM Corporate RIM program, and implemented and managed Electro-Motive Division's RIM program. This article was first published at http://blog.ironmountain.com/author/cgrimestad/

How to write
a recordkeeping policy

So you're about to write a policy about recordkeeping, only you're not exactly sure what a policy is, which process to follow or what it should contain? The following article, based on a workshop the author ran on the subject, may get you started.

By **Glen Morgan**

So, what is a policy? Generally speaking, a policy is a concise formal statement indicating how the organisation will act in a particular area of its operation. In this case – recordkeeping.

But first, let's go back a bit – sometimes for first-time policy writers or indeed for most of us, it's good to revisit the basics so we get a firm picture in our head of what to expect.

From the literature there are two views on policy development. Firstly, **rational problem solving is** where rational thinking is used to shape the way a policy is developed – researching the problem, looking at options etc (that's the theory anyway!). Secondly, **rationalising what has to be communicated** usually with the inference that policy conceals the *hidden purposes* of bureaucratic power or dominance masking its true intent by hiding it behind a cloak of rational planning. Which is a bit fairytale-ish or Machiavellian!

From my experience in developing policy in the public and private sectors, neither of these views does justice to the complexity of policymaking, nor its implementation.

Policy development requires a level of creativity and a range of skills to negotiate the development and implementation phases – it is no different to any other process and involves a series of steps and people's involvement (willingly or unwillingly).

PREDEVELOPMENT PHASE
– DEVELOPING A RECORDKEEPING POLICY

Seek approval and support

Without senior level management approval and support it is unlikely that the process of developing the recordkeeping policy will be workable or viewed as official. The very approval process sets the scene and provides credibility for the rest of the process including its implementation.

Identify issues

Experience tells us it is better to anticipate a problem than to be surprised, so think about time of year – school holidays, Easter, Christmas – is that going to impact on people's availability? Are there any major issues affecting operational areas? Do a quick risk analysis – how will you deal with each risk?

Conduct analysis

◆ Identify who will own the recordkeeping policy and include this information in the policy document itself as they are responsible for the content and its maintenance including reviews.

◆ Determine the best way to develop the policy by considering subject significance, internal and external reactions, approval process and ongoing maintenance.

◆ Identify who needs to be involved to develop an accurate and complete recordkeeping policy. What expertise is needed, and is this available internally or do you need external support?

DEVELOPMENT PHASE
– DEVELOPING A RECORDKEEPING POLICY

Language

◆ Agree on definitions as not everyone will think the same and it is better to get agreement upfront than later. Agreement will provide clarity during the drafting process.

◆ Use a common format to reinforce this is an organisation-wide policy. The format helps to break up policies into digestible chunks.

Get approvals

Secure approvals before the process begins on the overall purpose and expected outcome. A review of draft policy statements can be critical to avoid any misunderstandings about scope, timing, responsibilities and ownership.

Plan to get it known

Plan how to communicate, publicise and educate what the policy means, who needs to use it, when it is going to happen. Use online channels and make it easy to find. Search tools should provide as many options as possible for finding the policy.

MAINTENANCE PHASE
– DEVELOPING A RECORDKEEPING POLICY

Evaluate and review

Develop a plan for active maintenance and review as this will ensure that the policy is kept current. Encourage feedback on what works, what could be better and what is unclear. Make sure you keep a record of the changes as they will inform the next review or other policies.

Measure outcomes

Plan measurements and compliance as it is important to know how useful the policy is and whether change has taken place. How has this policy improved your organisation – this is a good selling point that you can build on.

SO WHAT TYPICALLY IS IN A POLICY?

The content and layout of a policy will vary however the following provides a typical structure, but remember policies are written to address specific issues so its length may be one page or several.

Hints and tips

◆ Use 'must' if action is mandatory.

◆ Use 'recommended' if action is recommended.

◆ Avoid using 'should' and 'shall' as these are confusing.

◆ Try limiting the use of 'will' to occasions when it is describing a future action; and not as a synonym for 'must'. Otherwise it gets confusing for your reader.

◆ Use the present tense and active voice where possible.

> Plan how to communicate, publicise and educate what the policy means, who needs to use it, when it is going to happen

◆ **Policy title** – make this clear and concise and include the word 'policy' eg, Recordkeeping Policy.

◆ **Purpose** – explains *why* you are writing the policy eg, to ensure full and accurate records of all activities and decisions of 'xxx' are created, accessed, used, stored, retained and disposed of appropriately, in accordance with the (name of Act).

◆ **Scope** – provides a clear statement about *when* and to *whom* the policy applies eg, this policy applies to all records regardless of media made and kept, or received and kept, by any person including permanent, temporary, casual, graduates, consultants, trainees, contract and work experience staff, third party providers of services in the course of the exercise of official functions, or for any purpose, or for the use of 'xxx'.

◆ **Policy** – clearly states the standards or essential features which underpin the 'Principles' policy. For recordkeeping these can be found in AS ISO 15489 or a State archives' standard such as Queensland State Archives' IS40 Recordkeeping.

◆ **Definitions** – include definitions of any terms so that there is a *shared understanding* when reading the policy eg, define what is meant by a record, information etc.

◆ **Responsibility list** – who is responsible for what – only titles should be used, not a person's name eg, CIO is responsible for ensuring all systems containing records is managed appropriately.

◆ **Review date** – when will the policy be reviewed eg, March 2014?

◆ **Authority** – states under whose authority the policy is used. ❖

• Note: Any relevant legislation or other related documents can either be included in the policy itself or as an appendix.

ABOUT THE AUTHOR

Glen Morgan MA (Research), BApSc(Inf), MRIM is Principal Consultant, Consulting Business Information Services and has many years' experience working in strategic and operational management roles in the public and private sectors. Commencing her career in the construction and mining sector, Glen explored how she could better utilise information in her operational roles. She then went on to lead major information management and business improvement projects, writing policy and successful business cases, implementing government reforms and legislation as well as developing information strategies and business contingency plans.

✉ Glen can be contacted at morganrg@optusnet.com.au or on 0412 09 1445.

Survey shows best and worst news for RIM

It's happening! The RIM horrors we've been listening to warnings about for the past decade are here. Rocketing legal, compliance and storage costs for the world's information management are threatening the 21st century's RIM professionalism… and senior management is ignoring the risks. These are among the findings of a new 2013 survey, *Information Governance: records, risks and retention in the litigation age[1]*, published in March by the US-based "global community of information professionals", AIIM.

By **Mike Steemson**

Don't be distracted by the US-dominance of the survey. One in 20 of the survey sources was Australasian; around one in eight, Western European.
 Threats, yes! But they are also the salvation. The survey found that IT is losing its value but the RM spend on automatic classification systems, electronic discovery and management is on the rise; a new dawn for records managers and recordkeeping

Lead by its Market Intelligence Director, Doug Miles, the AIIM (Association for Information and Image Management) survey ran across January and February this year with more than 500 member companies employing from 10 to 10,000 staff.

Doug Miles, Director of the AIIM Market Intelligence Division.

TOP 12 FINDINGS

Its top 12 findings were:

1 Effective information governance is being crippled by poor training. Only 16% of organisations regularly train all staff. 31% do no training at all.

2 Senior management is ignoring the risks. 31% of respondents report that poor electronic records-keeping is causing problems with regulators and auditors. 14% are incurring fines or bad publicity, 46% report "considerable financial impact".

3 The answer to the data problem is to let the computer do the filing. 14% are already doing automatic classification of electronic records, 37% are keen to do it.

4 45% of organizations plan to increase their records management spend over the next two years. Only 14% will spend less. In particular, automated classification is set for strong growth, along with enterprise search, RM modules, e-discovery and email management.

5 IT is losing its ability to transform business. For a third of organisations, 90% of IT spend adds no new value.

6 Something has to be done about content accumulation. For 29% the response to the information deluge is "buy more discs".

7 Despite good intentions, the delete button isn't being pressed. Electronic records aren't being deleted even when retention periods are set.

8 Emails are acknowledged as records, but the filing systems are chaotic. 73% include email in their retention policies, but most rely on manual methods to file them.

9 The content may be electronic but the e-discovery mechanisms are still manual. 53% are still reliant on manual processes for e-discovery searches across file shares, email and physical records.

10 Social content management is not even on the radar. Less than 15% of organisations are even trying to include social postings in their retention schedules.

11 Cloud is not in everyone's future. 46% of organisations would "definitely not" or "probably not" consider using cloud for managing electronic records. 23% would consider using their existing paper records outsourcer for cloud services.

12 Progress toward the 'paperless office' is slow. For 42% of organisations, the volume of paper records is still increasing.

ABOUT THE AUTHOR

Former London newspaperman Michael Steemson, ARMA, is the principal of the Calderson Consultancy in Wellington New Zealand and a member of the editorial committee of *iQ*.
✉ He can be contacted at mike.steemson@xtra.co.nz

BIG DATA STORAGE COSTS

Director Miles introduces the plain, well-constructed report with the quandary: "As the argument moves on from 'how do we keep stuff' to 'how can we defensibly get rid of stuff', we need to examine what shape enterprise records management takes and, in the big data age, how do we keep a lid on the escalating costs of content storage?"

Thick with clearly illustrative bar and pie-charts, the AIIM report makes a number of recommendations that look wonderfully familiar to most entrepreneurial records workers, but are worth their repetition after the revealing survey.

Business without an enterprise-wide, up-to-date information governance policy should "kick-off a project to create one", Mr Miles suggests, adding:

"If you already have an information governance policy but it is not being enforced, determine ways to monitor compliance. Look particularly at the implementation of deletion for electronic records beyond their retention period, and see if this can be automated."

He presses professionals to "raise the issue of retention management on storage volumes", and recommends the question to senior management: "What if we continue to do nothing?" The survey itself gives the answer to that one. ❖

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Member benefits

As membership renewal looms again you may be questioning what value you get from RIM Professionals Australasia membership. So what is the benefit of membership to you?

As well as offering a vast community of knowledgeable practitioners generously sharing their experiences, RIM Professionals Australasia offers many opportunities to its members, including the following:

1 IQ MAGAZINE SUBSCRIPTION

A subscription to *iQ* magazine, the RIM Professionals Australasia's peer reviewed quarterly publication – provided in hard copy but also available for download electronically to PC's, tablets and phones.

2 VAST INFORMATION RESOURCES

Free electronic access to vast information resources:

- Convention papers and presentations since 2000 and a limited number of free video presentations since 2011
- More than 28 years of iQ articles
- Back issues of *iQ* from 2005
- Copies of seminar papers and newsletters from RIM Professionals Australasia branches
- Survey and online poll results
- Member newsletter every six weeks
- Resource library of templates and tools from RIM Professionals Australasia Members
- Access to RIM community through the RM Listserv and Forums
- Marketplace – Online product and services directory

3 DISCOUNTS

Discounts (10% or more) for:

- RIM Professionals Australasia events including the annual convention inForum
- Posters, brochures and publications

4 PROFESSIONAL DEVELOPMENT

Plus professional recognition:

- Continuing Professional Development scheme
- Youth focus through Career Website, Advertising, DVD and Career Information Kits
- Professional Recognition through Grants and Awards
- Professional Recognition through Professional Status Upgrades
- Course recognition
- Provision of master classes, seminars, workshops and networking events
- Provision of free brochures and giveaways to help practitioners promote the industry
- Supporting like events to assist members to gain discounts to development opportunities

5 INDUSTRY INFLUENCE

Influencing the RIM industry:

- Collaboration with like industry Associations for events, Information Awareness Month and through MOU's
- Participation on Standards and other Industry related committees. ❖

Records management and social media

If your organisation is using social media to engage with stakeholders, there's an elephant in the room, and the elephant is records management. Many organisations are getting caught up in the excitement of the social web, with its new ways of communicating and engaging with stakeholders. That's all very well for dealing with today's issues, but where is the long-term value of our engagement with stakeholders if we don't keep records?

By **Alex Morrice**

THE PAST

It's not very long since our customers used to communicate with us by letter. If a customer wrote to us in 1976, referring back to an earlier letter that they had written in 1968, the chances were very high that we still had it in our files. Possibly it was gathering dust in a long-forgotten filing cabinet – but it would almost certainly still exist and be findable, even if the person dealing with the correspondence had long since left the organisation.

THE PRESENT

Letters were replaced by e-mail. E-mail isn't as straightforward. Sometimes the solution adopted by an organisation is to print e-mails, and then the paper copy is filed away in a lever arch file. It may be old-fashioned, but if it's properly managed, it can work well. By preserving the link between e-mails, letters, and file notes, and collating them into a single chronological sequence, it might even be one of the better solutions available to records managers.

Arguably a better solution is to capture e-mail in an electronic document and record management system (EDRMS). The reason this works so well is that, like the paper file, the context around the e-mail is maintained, and it can

story snapshot

> Social media represents a large part of the way we are going to be communicating with our stakeholders in the future, and if we are to realise its value, records managers need to find ways of managing it.

be filed in its rightful place alongside all of the other relevant information. Add the ease of searching an EDRMS, the mandatory classification structure, the searchability, and the ease of retention scheduling, and you have an ideal solution for e-mail archiving. By some measures, if you have an EDRMS, it's possible that e-mail is actually easier to manage than letters ever were.

The sad reality is that few organisations have fully deployed their EDRMS, leaving their e-mail records without any proper structure. People get round this with a variety of *ad hoc* solutions, all of which seem to cause problems for records managers. Some people keep all of their e-mails forever, causing problems with data protection and freedom of information, as well as the time lost searching huge e-mail archives. Some people delete all of their e-mails, thereby erasing essential records. Whatever solution users adopt

for organising e-mail, the sender and recipient are usually the only people who have access to them. Every time someone leaves the organisation, they leave a record-keeping black hole.

The result is that the customer of 2012, referring back to their e-mail of 2004, has very little hope of continuing the dialogue where they left off.

THE FUTURE

Bad as it is, that situation is better than the social media future, because even if we aren't always implementing the solutions, at least we understand the problems. Communicating by social media, on the other hand, introduces new layers of complexity, because it isn't just that we might not have access to the tools we need to archive information. Sometimes, we are attempting to archive information which isn't even under our own control.

Let's use Twitter as our example. Lots of organisations use it. Surely that isn't a problem? Twitter is archived. Isn't it?

Here are some things that records managers need to consider:

◆ Twitter only gives you access to your last 3,200 tweets. For a busy organisation, engaging with their customers on a daily basis, that might represent just a few weeks or months of customer communication.

◆ Twitter only allows you to search your tweets by keyword for the past seven days.

◆ Even if you rely on third-party apps for managing Twitter, those apps depend on the API, which is totally under Twitter's control. In August 2012, for example, Twitter's API dropped support for RSS, breaking many news feeds.

What else could go wrong? Well, what happens if Twitter's website goes down? Unlike when your organisation's website goes down, you aren't covered by contractual arrangements that will ensure its speedy restoration. Your contractual relationship with Twitter states that Twitter's services are available 'as-is', and that your access to the service is at your own risk.

Maybe it's unfair to single out Twitter. So let's look at The Knowledge Hub. This is a work-focused social network, publicly funded, and created as an online platform for the UK public sector to share and exchange knowledge and information, securely and freely. It's the sort of network, with no advertisers to satisfy, and a strong public service ethic, that should surely be ideal for official use.

The people behind the site agree, and they take their records management responsibilities seriously. For example, all of the information from the old Communities of Practice site (the predecessor to the Knowledge Hub) has been preserved by the Local Government Association (LGA) and is available on request to anyone with a legitimate need to access it. Unfortunately the LGA – who run the Knowledge Hub – are unable to reflect that ideal in their Terms and Conditions. Paragraph 3 is one section that might trouble a records manager: "We reserve the right to withdraw, suspend or amend access to all or any part of the Knowledge Hub Platform or cease its operation temporarily or permanently at any time without notice." Even bearing in mind the public service commitment that underpins the Knowledge Hub, it's not a clause that inspires confidence when writing a retention schedule.

The risk of a service being discontinued is real. The Knowledge Hub is itself the successor to an earlier network which no longer exists. A more familiar example, at least for people who have been on the internet since its early days, is GeoCities. This was once home to 38 million pages of content created by its users. It was hugely popular. In 1999, it was the third most visited website on the internet. None of that stopped Yahoo! shuttering it when it started to lose popularity, and it was closed in 2009 with substantial loss of data.

It seems then, that social networks may be a great place for having conversations online. But if the conversations you have via social media include information that your organisation needs to keep a permanent record of, it's important to control your own copy of that information.

HOW DO I DO THAT?

This is where records managers need to start being creative, because there are so many different tools on the market that it's hard to know where to start.

In the August 2012 issue of *iQ* ('Managing tweets as records'), Katherine Stevenson gave an account of using Twinbox to integrate Twitter with Outlook, allowing her to archive tweets in an existing EDRMS. That's just one of the many tools available. Another that looks particularly appealing for records managers is ThinkUp – an Open Source app which you can install on your own servers. Its primary market is network analytics, but it also allows users to export all of their tweets to a CSV file – ideal for importing into your organisation's database or EDRMS as a permanent record.

Of course, the position is different for every social network. Exporting data from Facebook, for example, is reasonably straightforward. Thanks to the Irish Data Protection Commissioner, Facebook's account settings let you download a copy of all your Facebook data, complete with all the photos, likes, and status updates that you have shared via the site. It even includes all of the comments that friends have left on your wall. The irony is that this openness, resulting from a data protection audit, can actually cause data protection issues for organisations using Facebook, because Facebook's insistence on one account per person means that people using Facebook on behalf of their employers will often be doing so using their personal account, so their personal data can all too easily get mixed in with organisational data. Nonetheless, it is at least clear that Facebook is taking the issues of data ownership and portability seriously.

If your organisation uses Flickr for interacting with stakeholders, you're going to need to use some ingenuity. Flickr markets itself, amongst other things, as a place to back up photos from your hard drive. But if the photos weren't yours in the first place – if, for example, you have asked stakeholders to add photos to a public Flickr group to document an event that you are organising, then the photos on Flickr aren't backups. So far as your organisation is concerned, they're originals.

If you want to maintain a permanent archive, the only way to avoid having to download every photo individually is to use a third party tool such as Flickr Downloadr. Even then, all you are getting is the photos themselves. All of the interactions – the comments, the 'faves', the notes – are lost forever. You might have the EXIF data, giving you a permanent record of when the photo was taken, and maybe even the location, but

> *Sometimes, we are attempting to archive information which isn't even under our own control*

if you want to know who the photographer was, the names of the people portrayed, or whether the photo was shared using a Creative Commons licence, you will almost certainly need to note the information manually.

ISN'T THIS ALL JUST ALARMISM?

What if all of these social networks are here to stay? Even if they aren't here to stay, isn't a lot of the information ephemeral? Once the environmental warden has been despatched, do we really need to keep records of dog-fouling reports? Well, even in a pre-social media environment, records like that will have had a limited retention period, so it's true to say that not all communications via social media need to be formally managed beyond their normal social media lifespan.

It isn't hard, though, to think of examples where stakeholder engagement offers lasting value that your organisation has a duty to preserve. Think back to the event where an organisation was encouraging visitors to upload their photos to a photo-sharing website. Visitors voted on their favourites, and shared stories about what the day meant to them and their families. Now fast-forward to the day when the children in the photos have children or grandchildren of their own. Some of the parents in those original photos are no longer with us. How valuable are these Web pages now? Can we really afford to leave responsibility for managing those Web pages to someone else? Your organisation was responsible for creating this event, and for people sharing their unique perspectives. You created an archive record whose value is larger that the value of any of its component parts. You have a responsibility to ensure that that archive lives on, well beyond the lifespan of the website that originally hosted it.

WEBSITE ARCHIVING

A number of national libraries are trying to address this issue by creating and maintaining digital deposit libraries, which treat websites like books, preserving them forever. Their approaches are widely different. In the UK, the British Library makes its web archive publicly accessible, but it always seeks permission from website owners before archiving the website. In France, the BnF uses legal deposit to automatically harvest French websites, but their archive is only accessible to researchers who visit the library reading room in person. The approach they have in common is that they make no attempt to capture social media websites.

The Library of Congress, on the other hand, is trying to address that gap. In a 2010 blog post, they announced that they would create an archive of all public tweets. It's a step in the right direction, but even the Library of Congress approach falls well short of an online, searchable database. The licence terms allow the library to use the archive only for "internal library use, for non-commercial research, public display by the library itself, and preservation". As to what that means in practice, details are scarce, but it seems clear that records managers can't rely on the Library of Congress to do their archiving for them.

The Wayback machine – a service provided by the Internet Archive – also attempts to fill the gap, but its snapshots of archived websites are too infrequent to build up a comprehensive record of a busy website at every stage in its history, and attempts to browse archived versions of Flickr, for example, frequently lead to missing photographs.

What sort of alternatives are available? Can you crawl the website yourself? Can you print off the pages and save them as a PDF? Can you download the elements individually and recreate the content in a standalone archive? There are no clear answers.

⟹

THE PUBLIC RECORDS (SCOTLAND) ACT 2011

If you're in the Scottish public sector, records management has new set of obligations to consider. The Public Records (Scotland) Act 2011 obliges Scottish public authorities to set out proper arrangements for the management of their public records. Public records are defined as "records created by or on behalf of the authority in carrying out its functions". That's a wide-ranging definition.

The report that came in via FixMyStreet about a pothole? If your council acted on it, it's a public record. The consultation your organisation undertook using Facebook? It's a public record. The Yammer stream where you agreed with your manager to trial a new reporting structure? It's a public record.

The bottom line: when we, as public authorities operating in Scotland, carry out official duties using social media, we may be creating public records, and we have a legal obligation to manage them properly. In most cases, this will mean making copies that we control. Sometimes there

ABOUT THE AUTHOR

Alex Morrice is a former librarian, now working as Knowledge Manager at Registers of Scotland.

✉ He can be contacted at Alex.Morrice@ros.gov.uk
Twitter: @scotinfo

are tools that allow us to do it as part of our normal workflow, but not always, and that's a problem that records managers need to address.

AND THAT APPLIES TO EVERYONE

Ultimately, it makes no difference whether you are working in Scotland, England, or anywhere else in the world. It makes no difference whether you are in the public sector or the private sector. Social media represents a large part of the way we are going to be communicating with our stakeholders in the future, and if we are to realise its value, records managers need to find ways of managing it.

• This article first appeared in the *Bulletin* (the journal of the Information and Records Management Society, UK), in January 2013.

CASE STUDY
(ALL NAMES HAVE BEEN CHANGED)

Stakeholder engagement at Glenshire Council was proving elusive; Community Council meetings were poorly attended, and few householders were aware of the methods that were open to them for communicating with council officials. John Newman, a community worker at the council, identified social media as a way of reaching out to local residents, allowing them to engage with the council on the subjects that were important to them, without forcing them to get bogged down in other issues that were of little relevance.

Newman set up a Facebook page where people left wall posts alerting the council to potholes in their street, or asking questions about library opening hours. The Customer Services team monitored the page, posting replies where needed. When messages required action by the council, the Customer Services team re-keyed the request into a case management system, which was

built in-house using an Access database. This was the same database that the team used for telephone and letter enquiries, so it provided a single source for management information. Sometimes, information from Facebook was cut-and-pasted into the Access database. This preserved the core record, but it also meant that, so far as Glenshire Council was concerned, the metadata surrounding the wall post was lost forever.

Newman also set up a Twitter account, which his team used to broadcast news about what was happening in the area, and which customers used to report environmental concerns, and to ask questions about council services. Again, anything which required action by the council was re-keyed into the Access database, so a permanent record was preserved.

After using Twitter for a year, the number of tweets from the council's account was reaching the Twitter maximum of 3,200, so Newman started backing up all of the council's Twitter data, exporting it via Think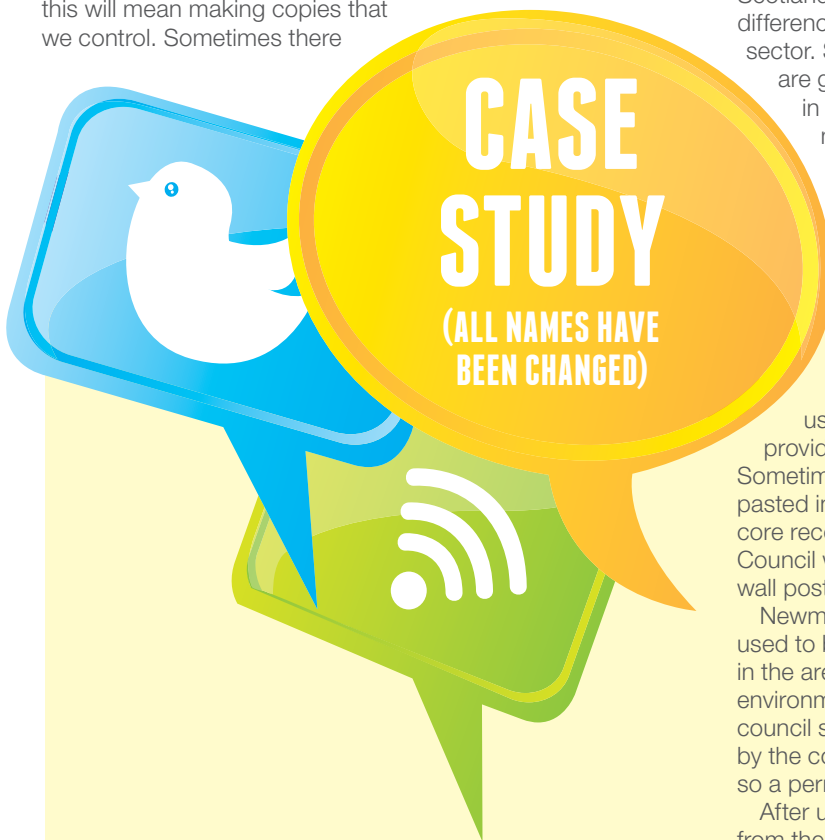Up to a CSV file. This was very successful, allowing Newman to create a permanent copy of the data behind his council's firewall, but he couldn't help worrying whether continued access to the raw data feed was at risk if Twitter made any changes to the API.

Newman was also aware that there were no links between the Access database, the CSV file, or any of the council's other records management systems. His own team knew where the information was kept, but what about the rest of the council? If an FOI request came in when he wasn't around, would the FOI team know where to look? And what about the information which never got entered into the Access Database, because it didn't require a response? He was trying, but social media made it so hard to plug all the gaps in the record keeping. ❖

BETTER INFORMATION MAKES A BETTER BUSINESS

A year ago the author embarked on her dissertation, the final leg of her long-distance studies towards an MSc in Records Management and Digital Preservation awarded by the University of Dundee. Her remit was to carry out an analysis of the records management situation at a company operating in the private sector. The director of the company intended to incorporate her findings in a dynamic improvement project aimed at ensuring business continuity in terms of competitiveness and efficiency through the provision of excellent services.

By **Romaine Petrocochino**

At the root of my dissertation lay the assertion that records are the lifeblood of an organisation and a well-planned records management program is indispensable for the efficient running of a business.[1] The research sought to discover the state of awareness of records management as a distinct and unique administrative and management process, the significance given to records management policies and practices, and staff accountability in terms of records management responsibilities. It also sought to inform if any change is necessary.

The study was carried out through a combination of the questionnaire and interview research instruments. The questionnaire made use of both 'open' and 'closed' questions, soliciting qualitative and quantitative baseline data. Given the relatively small number of high-value information sources available within the company, a face-to-face interview method was chosen to ensure a positive response rate, help guide the respondents through the questionnaire, document opinions and suggestions and minimise the need for any follow-up enquiries. A target group of 40 respondents was chosen as a purposive representation of the members of staff considered to have records management responsibilities. All respondents agreed to participate and the 100% response rate permitted a comprehensive analysis of the records management situation within the company. The findings revealed the following situation.

- There is no records management program.

- There is no hierarchical organisational structure and roles are not linked to functions, thus there is no clear indication of the relationship between staff, sections and departments.

- There is no established point of authority for records management responsibilities; records management is considered as an administrative process and thus responsibilities are not associated to records management processes and procedures.

- A daily aggregate of 108 out of the 215.5 hours worked by respondents are spent on records management related tasks.

- Staff have not received records management training.

Records kept in offices are not secure and may be accessed by unauthorised persons due to lack of security

◆ There are no written policies, strategic plans or guidelines for the management of paper, electronic, hybrid records or e-mails; the records dealt with are in both paper (48%) and electronic (52%) format.

◆ There is no records inventory, nor a corporate file-plan; a records survey has never been carried out.

◆ There are no retention schedules and no guidelines on which to base disposal decisions; departmental needs and space concerns were cited to justify ad-hoc retention decisions; records are kept in offices for as long as possible or transferred to the company archives.

◆ Recordkeeping systems consist of informal decentralised work area systems and do not incorporate preservation methods.

◆ There is haphazard monitoring of file movements; files related to core functions have been lost on occasion.

◆ There is haphazard management of electronic records; the IT service provider offers technical and infrastructural support but is not actively involved in records management related issues such as staff training on the management of electronic records.

◆ Vital records do exist in departments and archives, yet in the majority of cases these are unidentified; the current situation precludes timely action in the event of a disaster.

◆ Records earmarked for long-term retention are stored in areas officially designated as archives as well as in personal caches spread across offices, departments, diverse areas on the premises and at respondents' homes; this chaotic and inefficient situation has created isolated information silos; records retrieval from the archives is difficult and some staff opt to keep inactive records in their office.

◆ Records kept in offices are not secure and may be accessed by unauthorised persons due to lack of security.

◆ Records contain both sensitive and personal data.

◆ Workflows overlap different departments creating a network that demands efficient information sharing; there is efficient information retrieval within own departments but not across departments; such accessibility problems underline the need for professional records management practices including systems for the management of hybrid records and appropriate access rights.

◆ Information about the electronic records being created, maintained and stored on staff personal computers is lacking; there is a need to promote a culture of corporate ownership of records as opposed to the current individualistic workstation ownership; the discrepancy in efficiency in the two retrieval scenarios (internal or departmental versus external or other departments), denotes the need for a more centralised and holistic recordkeeping system.

◆ The current individualism hinders the development of the corporate and collective memory.

◆ Accidental disposal of records reflects the lack of retention schedules that control disposal action; misplaced or misfiled records reflect poor physical

ABOUT THE AUTHOR
Romaine Petrocochino has been involved in the Libraries and Archives scene for the past 30 years, working both in the public and private sector. The research referred to in this article was carried out in the course of her MSc studies in Records Management and Digital Preservation at the University of Dundee.

management and the lack of a standardised classification system; unsuccessful subject search denotes the lack of file plans or inconsistency in their use; inability to trace unreturned files is a direct consequence of not keeping track of file movements.

◆ Fire detection devices and fire hydrants are not present in all areas where records are being held.

◆ Some respondents do not believe that there is any need for change, thus indicating that there is resistance to change.

THE FINAL ANALYSIS

The company's current records management practices are unprofessional, inconsistent and piecemeal. Discovery of best practice is left up to individual staff members and there is a lack of an organisation-wide records management culture. Staff are not held accountable for records management responsibilities. Departments work in isolation with the perception that work is 'my work' rather than part of a bigger business process which must be shared.[2] There is an attitude of "my records in my cabinet in my office" with records being treated as personal possessions rather than corporate assets.[3] This is not conducive to a collaborative effort and as a result there is a lack of information flow across departments and sections. There is a "subjective approach to retention of records and information; a haphazard and opportunistic approach to the identification and transfer of potentially-archival records to the archive".[4] Management has failed to provide records management guidance and staff fail to see the bigger picture and their role in the record's lifespan.

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In the aftermath of this analysis, I presented my findings and recommendations to the company Board of Directors. Some of them had participated in the study and were already sensitised to issues mentioned in my report. My recommendations included the setting up of a steering committee to develop and oversee the implementation of a records management programme tailor-made for the company's exigencies. Special emphasis was placed on the need for policies and standards that support a records management programme, a holistic organisation-wide approach, staff training and change management. The director went on record to state that changes must be made and has already set the ball rolling. To date, an organisational plan has been drawn up, an e-mail policy has been drafted and new software installed to enable a more centralised and integrated records system across departments. Things seem to be moving in the right direction! ❖

• This article first appeared in the *Bulletin* (the journal of the Information and Records Management Society, UK), in January 2013.

The Decision:
A story about recordkeeping

Let me tell you a story.
It's not a long story,
Or even a new story.
But it is a true story.
Mostly.

It's about a public servant.
To avoid any embarrassment
We'll call him Public Servant 'A'.
That's what the inquiry called him anyway.

Public Servant 'A' made a decision.
It wasn't a big decision,
Or even a complex decision.
It didn't make headlines,
Well. Not right away.

'A' knew all the issues,
He applied all the rules,
He had the delegation,
And he used all the tools.

He examined all the options
He weighed all the risks.
The decision was the right one,
At least at the time.

He did everything right,
'Cept for one little thing.
But it didn't seem important
In the big scheme of things.
After all, it was just paperwork.

It was some time later
When the auditors called.
Not just to see 'A',
But the project overall.

They examined the decision
They asked to know why.
Where is the evidence?
How did you decide?

'A' had no answer.
What could he say,
Without documentation
To keep them at bay?

"Insufficient evidence"
The auditors said,
"To conclude that there were
no major breaches in the process".

The report was made public,
As they usually do
The Opposition cried foul
You would too wouldn't you.

The Minister quit
A by-election announced.
A lovely safe seat
Was suddenly trounced.

It was an election year
And the Government lost.
For the want of a record,
What was the cost?

There's a moral to this story,
Always is at the last.
Do you keep enough records
To cover your accountability
needs?

The getting of wisdom

Rather than having to learn by our own mistakes, it's often through the mistakes of others that lessons in recordkeeping are best learnt.

By **Allen Hancock**

I t's official. Back office staff, which includes records and information managers, are considered to be less experienced and of a lower quality than our frontline colleagues. It's in Hansard if you want to look it up.

"It is important to keep our experienced, high quality staff on the frontline and give them avenues for promotion and advancement that don't force them into administrative roles."[1]

Perish the thought that frontline staff should ever be forced to do anything administrative. Apart from devaluing the work done by staff in the back office, there is a further consequence. If you take away the administrative support provided by administrative staff, won't that in itself force the frontline staff into the very administrative roles you were trying to save them from?

In June 2011 the Victorian Ombudsman observed that, "accountability is being weakened by the clumsy way in which we manage records".[2] But he wasn't talking about the management of records by RIM specialists. He was referring to the lack of support provided by the senior executive. But even more importantly to the lack of attention that frontline workers pay to what is really a basic function of any role: keeping evidence of what you did, what you discussed, what you decided in the course of your work.

BE WARNED

A wealthy, successful businessman was once asked about the secret of his success. He responded:
"Two words… Right decisions."
"But how do you make right decisions?"
"One word… Experience."
"But how do you get experience?"
"Two words… Wrong decisions."

It's long been said that 'experience is your best teacher', but you need to keep in mind that it doesn't always have to be your own experience.

We don't tell our kids not to run with scissors 'cos we said so. We tell them that somebody could poke an eye out with those things. You could fall over and hurt yourself. We tell them of the risks. Risks hard-learned by many kids who ran with scissors before them.

A business doesn't manage records and information for the sake of complying with RIM legislation. A business manages records and information because there are risks associated with not being able to produce evidence to show that a raft of other legislation has been complied with.

In the 5th Century BCE a Greek slave introduced a code of ethics through the telling of simple stories that we know today as *Aesop's Fables*. One such fable is the story,'The Fox and the Sick Lion'.

A Lion, unable from old age and infirmities to provide himself with food by force, resolved to do so by artifice. He returned to his den, and lying down there, pretended to be sick, making sure all the other animals knew about it. The animals expressed their sympathy, and came one by one to his den, where the Lion devoured them. After many of the animals had similarly disappeared, the Fox discovered the trick. Presenting himself to the Lion, he stood on the outside of the cave at a respectful distance and asked him how he was.

"I am very middling," replied the Lion, *"but why do you stand without? Pray enter within to talk with me."*

"No, thank you," said the Fox. *"I notice that there are many prints of feet entering your cave, but I see no trace of any returning."*

The moral? He is wise who is warned by the misfortunes of others.

LEARNING FROM OTHER'S MISTAKES

In August 2011 the Victorian Auditor-General noted that:

"Each year we find functional findings that seem to be common across different audits, different agencies, different operational areas. Most often they point to common challenges, not in what we do, but on the way we do it. Sadly some persist year upon year. The public sector is lucky to have access to this information across the whole of government – beyond just your own audits. VAGO encourages you to leverage this free access and grasp this opportunity to learn from others."[3]

The Victorian Ombudsman expressed a similar frustration at the failure of public sector agencies to heed the warnings contained in his investigations.

"I identify and report to Parliament on areas of defective administration with recommendations for improvement or change. While in many cases my reports relate to specific circumstances relevant to a particular agency, they have a wider application across the public sector. When weaknesses are identified some agencies are effective in implementing improved processes and others are not. This year, some of my reports have highlighted persistent administrative problems that have been previously identified by my office. Agencies that fail to address problems when they are formally identified by my office elect, by that omission, to continue to conduct their business in a flawed, unreasonable or improper manner. This is unacceptable."[4]

But this isn't new nor does it just apply to Victorian agencies. In 2005 and 2006 the Commonwealth Ombudsman investigated 247 immigration detention cases. Eight published reports contained the results of those investigations. He then drew together 10 lessons from the immigration reports that he found were relevant to all areas of government.

"The administrative problems and errors exposed in those reports are not unique to immigration administration or even to public sector. They can be applied to any organisation.

… Administrative decision making directly affects the lives and wellbeing of members of the public. For that reason alone the records that underpin decisions must be accurate, comprehensive and accessible. … The emphasis on records-management practices may seem pedantic at times, but the lesson to be grasped is that looseness or slippage in records-management practices is but a short step away from more serious errors and consequences."[5]

In April 2012 the Victorian Auditor-General reported on the management of Freedom of Information. Although the audit focussed largely on two agencies, one important recommendation was that, *"Agencies should review the findings … and apply lessons where necessary in their own organisation".[6]*

The report wasn't intended to show how bad the two agencies in focus were, or to catch them out. The report used those agencies to exemplify the general state of FOI management. How many agencies have in fact used that report to identify and apply those lessons in their own FOI management?

In August 2011 the Commonwealth Ombudsman identified the role of oversight agencies as being:

"To help governments to improve public administration through:

◆ *fair and transparent operations*

◆ *plain – jargon-free – language*

◆ *seamless, customer-centred service delivery, and*

◆ *socially inclusive services.*

Some agencies take the view that a negative report must be avoided at all costs. But this isn't productive. It is sometimes possible to see systemic errors and their implications for the public from within an agency, but not always. It's even more difficult to take a whole-of-government point of view. The reality is that no agency is perfect, but by virtue of the work done by oversight agencies they are well positioned to identify where problems in other agencies lie."[7]

I was recently asked to look at the number of investigations in Victoria to see how many referred to agency records. During 2009-2010 80% of published Victorian Ombudsman and Auditor-General investigations identified poor recordkeeping as a contributing factor to poor agency administration. The topic investigations criticised most was decision making and in particular the documenting of decisions.

In Queensland the Ombudsman also identified decision making as an important issue, so much so that in 2007 he published a guide to good decision making. According to the guide:

"The quality of an administrative decision will depend on the decision-maker's knowledge, experience and integrity. Decision-makers must be able to gather and analyse relevant information, observe any legal requirements and properly apply any relevant policy.

Accurate record keeping is an important component of good administrative practice. This concept is supported by the obligation imposed on public agencies by the Public Records Act to make and keep full and accurate records of their activities."[8]

The Queensland Ombudsman even draws a link between maladministration, corruption and poor recordkeeping.

"Poor records are the building blocks of poor decisions. Time and time again investigations into corruption have demonstrated that link. If public officers wish to behave corruptly poor recordkeeping will be their ally."[9]

BEING ACCOUNTABLE AND TRANSPARENT

I was watching a program recently on the bombing of Darwin. After the bombing the Air Force commander made a decision that the base personnel should go half a mile down the highway and then half a mile into the bush where they would be given their orders.

Due to miscommunication some went a mile down the road; some went five miles down the road while others just kept on going down the road. Others still just said, "WHAT?" and stayed where they were.

If the commander had kept a record of why he made the decision he made and of how that was communicated we would have a much better understanding today of what happened.

Outcomes and decisions are important but in the end it really doesn't matter whether a decision itself is good, bad or indifferent so long as you can show evidence of how you came to the decision and what you did with the decision once it was made.

The 'Sports Rorts Affair' was a celebrated case from 1993 that illustrates much about the relationship between poor recordkeeping and incompetent, negligent or corrupt public administration. It involved the former Commonwealth Minister for Sports, Ros Kelly, her failure to account for decisions relating to the award of government grants to sporting bodies, and her inability to counter allegations that she had distributed the money disproportionately to marginal electorates to gain electoral advantage for the Labour Party. The affair centred on the use of a whiteboard to record the process of decision making that went on in the ministerial office – and its subsequent erasure.

"The key question was, did Ros Kelly behave corruptly and get caught out, or was she merely a poor recordkeeper, the victim of an inadequate recordkeeping system and a piecemeal recordkeeping regime?"

The Auditor-General reported that he could not find any documentation explaining the rationale for grants made, and therefore could not assess her decision-making procedures.

The Auditor General subsequently noted that *"poor recordkeeping attracts corruption like flies to a carcass".[10]*

As a consequence of the 'Sports Rorts Affair', the Commonwealth Auditor-General's office produced a Guide to Better Practice Grants Administration in 1994 dealing primarily with decision-making. The report has since been updated in 1997, 2002 and 2010.

The guide requires that:

"The decisions taken in relation to grant applications are to be documented in a manner that:

◆ *promotes transparency and accountability and*

◆ *demonstrates compliance with all relevant statutory and policy requirements,*

◆ *including by recording the information on which the decision was based and*

◆ *the substantive reasons for the decision."[11]*

> *The moral? He is wise who is warned by the misfortunes of others*

Accountability involves agencies and decision-makers being able to demonstrate and justify the use of public resources to government, the Parliament and the community. This necessarily involves keeping appropriate records.

Transparency refers to the preparedness of those involved in administration to open an activity and its processes to scrutiny. This involves providing reasons for all decisions that are taken and the provision of information to government, the Parliament and the community.

So you'd think with such a selection of guidelines for administrative decision making there'd be no reason for it to happen again.
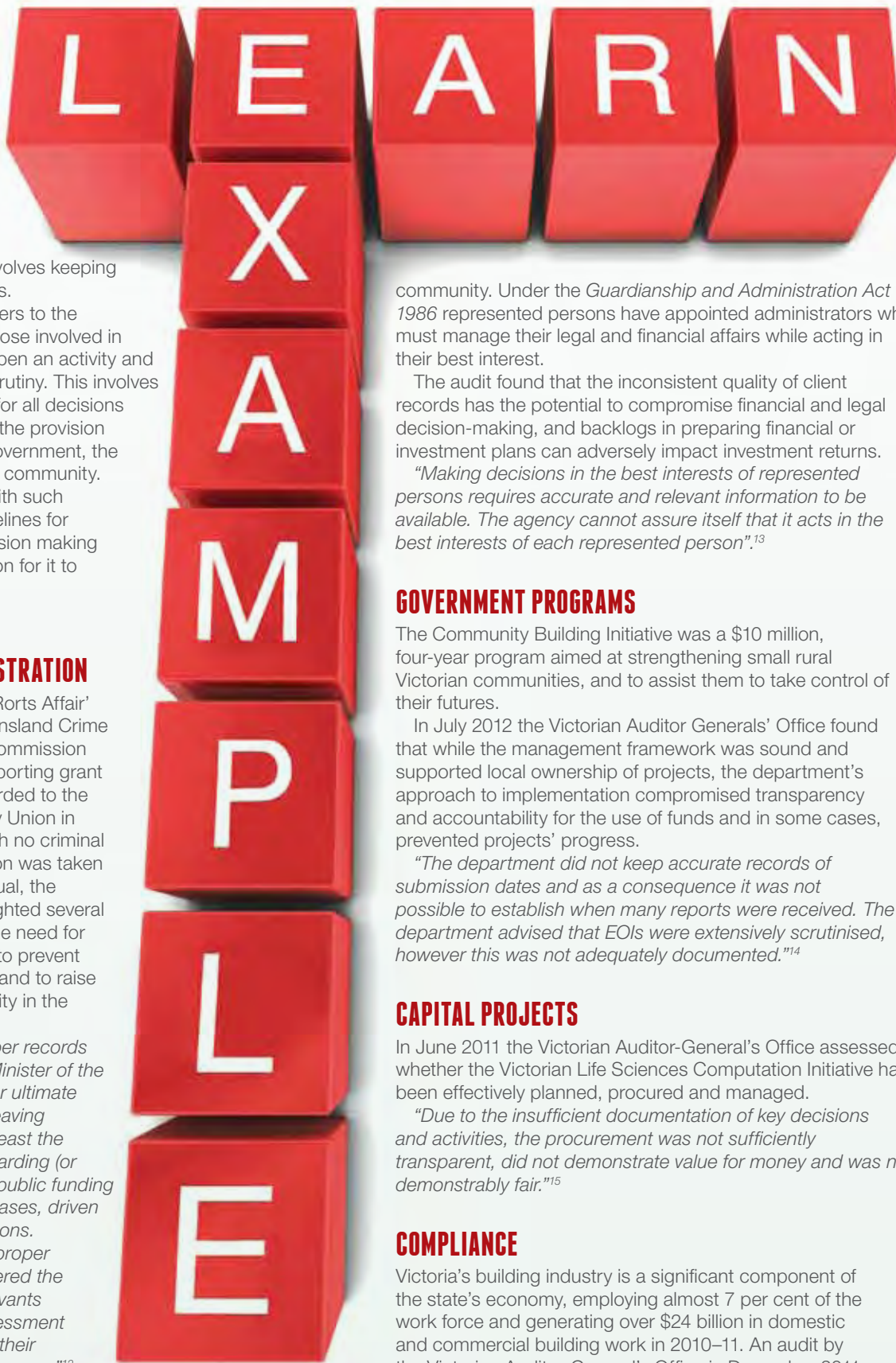
You'd think!

GRANTS ADMINISTRATION

The 2010 'Sports Rorts Affair' concerned a Queensland Crime and Misconduct Commission investigation into sporting grant of $4.2 million awarded to the Queensland Rugby Union in July 2008. Although no criminal or disciplinary action was taken against any individual, the investigation highlighted several issues, including the need for procedural reform to prevent future misconduct and to raise standards of integrity in the public sector.

"The lack of proper records has deprived the Minister of the ability to defend her ultimate decision making, leaving her exposed to at least the perception that awarding (or refusing to award) public funding was, in particular cases, driven by political motivations.

The absence of proper records has hampered the ability of public servants involved in the assessment process to explain their decision-making process."[12]

LOOKING AFTER CLIENT INTERESTS

Represented persons are those deemed incapable of managing their own affairs due to disability, mental illness, injury or other incapacitating circumstances. They are considered to be among the most vulnerable members of the community. Under the *Guardianship and Administration Act 1986* represented persons have appointed administrators who must manage their legal and financial affairs while acting in their best interest.

The audit found that the inconsistent quality of client records has the potential to compromise financial and legal decision-making, and backlogs in preparing financial or investment plans can adversely impact investment returns.

"Making decisions in the best interests of represented persons requires accurate and relevant information to be available. The agency cannot assure itself that it acts in the best interests of each represented person".[13]

GOVERNMENT PROGRAMS

The Community Building Initiative was a $10 million, four-year program aimed at strengthening small rural Victorian communities, and to assist them to take control of their futures.

In July 2012 the Victorian Auditor Generals' Office found that while the management framework was sound and supported local ownership of projects, the department's approach to implementation compromised transparency and accountability for the use of funds and in some cases, prevented projects' progress.

"The department did not keep accurate records of submission dates and as a consequence it was not possible to establish when many reports were received. The department advised that EOIs were extensively scrutinised, however this was not adequately documented."[14]

CAPITAL PROJECTS

In June 2011 the Victorian Auditor-General's Office assessed whether the Victorian Life Sciences Computation Initiative had been effectively planned, procured and managed.

"Due to the insufficient documentation of key decisions and activities, the procurement was not sufficiently transparent, did not demonstrate value for money and was not demonstrably fair."[15]

COMPLIANCE

Victoria's building industry is a significant component of the state's economy, employing almost 7 per cent of the work force and generating over $24 billion in domestic and commercial building work in 2010–11. An audit by the Victorian Auditor-General's Office in December 2011 examined how effectively the activities of municipal and private building surveyors are regulated and how councils enforce compliance with building permits within their municipalities.

"The lack of documentation and supporting reasoning for surveyors' assessments makes holding them accountable for their decisions difficult, and creates an environment in

which the inherent risks of collusion and conflicts of interest in the relationships between builders and building surveyors can go undetected."[16]

INCIDENTS

In November 2011 an investigation by the Queensland Ombudsman examined the fairness, legality and effectiveness of actions taken and decisions made by a number of agencies that have concurrent and sometimes overlapping biosecurity, human health and other responsibilities for the identification, control, management and treatment of the Hendra virus incidents that occurred in Queensland between 2006 and 2009. The Hendra virus is a relatively new and serious disease that has killed both humans and horses in Queensland since it was first identified in the Brisbane suburb of Hendra in 1994.

"Failure to keep records of the reasons for decisions constituted administrative action that was unreasonable within the meaning of the Ombudsman Act. In the context of biosecurity incidents, the records of decisions must be detailed enough for supervisors and review bodies to be able to properly consider those decisions."[17]

INVESTIGATIONS

In January 2011, the Commonwealth Ombudsman conducted an audit into the way in which biosecurity investigations have been undertaken. One of the main issues arising out of the audit related to the need to ensure defensible decision-making by keeping comprehensive records and detailing the reasons for decisions. The audit highlighted the need to ensure that the planning and record keeping of an investigation, along with case management practices show that decision-making is transparent, defensible and consistent.

"In the context of investigations, comprehensive and contemporaneous record keeping is essential for evidentiary purposes, demonstrates the consistency of decision-making over time and is the basis for defensible decision-making should the decision ever be reviewed or tested in courts."[18]

There are lessons to be learnt from problems encountered by other organisations and failure to document decisions most common observation in the majority of audits and investigations. Every audit and investigation starts the same way, examination of evidence, and the bulk of the evidence will be found in an agency's records.

Insufficient evidence to conclude that there were no major breaches in the process is the same as being found guilty except you may in fact be innocent. So is yours covered? ❖

ABOUT THE AUTHOR
Allen Hancock has more than 40 years' association with records and information management. He has worked in Commonwealth and State Government roles as well as in the higher education and private sectors. Allen is committed to the philosophy that 'recordkeeping is not rocket science' and that business processes for keeping records need to be consistent, simple to use and easy to access.
✉ Allen can be contacted at allendhancock@gmail.com

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Information governance:
new approach or old news?

The term 'information governance' has appeared more frequently over the last 12 months in various publications and in the media. Does it denote a new approach to the management of information or is it old news that information and records management professionals are only just catching up with? Records and information managers can use this increasing interest in information governance to improve awareness of the importance of information management and what we do. This article explores some of the definitions of information governance and discusses how our profession may utilise information governance approaches.

By **Kerri Siatiras**

I recently attended an information governance conference. Over the two-day conference there were only two presenters from an information management background. It became apparent early on that my concept of information governance was rather different from that of the data analysts, business intelligence gurus, IT managers and security specialists. This experience led me to consider: is information governance a new approach or old news? How can information and records managers use this approach to support the improved management of information in our organisations?

The February issue of *iQ* ran two articles on information governance; one looking at it from a compliance perspective and the other from a security perspective. In my view we need to look more broadly at the concept, and go back to basics in order to understand the real value proposition behind information governance for our profession.

WHAT IS INFORMATION GOVERNANCE?

The concept of information governance means different things to different people and different organisations. As a result there is no agreed definition for the concept and organisations have struggled to articulate the concept well enough to support action.

In my experience the definitions used in organisations often depend on the world view of the organisation, or more specifically the world view of an individual in senior management who can see information governance as a valid business strategy. I have heard governance described as the responsibilities and practices exercised by an organisations' Board or senior management in order to provide strategic direction, ensure targets and strategic goals are met and risks reduced. We can use this approach to our understanding of governance to better define information governance.

Information governance at a strategic level encompasses the governance of information across a number of different disciplines. Therefore information governance at this level means there must be coordination of efforts, initiatives and approaches between the disciplines. See diagram below.

A search for definitions soon reveals that most are focussed on Information Technology and they usually refer to IT Governance, Data Management, Security Governance and the like. The Gartner definition below (which Gartner acknowledges is derived from its definition of IT Governance) appears to be becoming the default industry definition.

"Information governance *is the specification of decision rights and an accountability framework to encourage desirable behavior in the valuation, creation, storage, use, archival and deletion of information. It includes the processes, roles, standards and metrics that ensure the effective and*

efficient use of information in enabling an organization to achieve its goals."[1]

It appears that some of the earliest discussions about information governance came from the health sector where the discussions were primarily in relation to the security and privacy of patient information. For example in New Zealand the health sector identified information governance as an issue as a result of a Ministerial Review in 2009 which noted that:

"The current level of strategic leadership and governance of the information and technology agenda is inadequate and unlikely to significantly realise the potential of this enabler for the health sector. In most health organisations this important responsibility is left to their Chief Information Officer and a few enthusiastic clinicians and managers. There is a tendency to 'oversimplify' and look for IT solutions without getting the fundamentals right, like looking at standardising clinical process and assessing the readiness for changes in behaviour necessary to make new systems work effectively."[2]

Some reference tools have been developed to model information governance. An example is the EDRM Information Governance Reference Model[3] which was developed to *"provide a common, practical, flexible framework to help organizations develop and implement effective and actionable information management programs".[4]*

ARMA International has also done some work in this area with the development of the Information Governance Maturity Model.[5]

But have these models and definitions left us any wiser as to what information governance really is? And how will we know when we have got it?

The adoption of an information governance approach will *"encourage desirable behaviour in the valuation, creation, storage, use, archival and deletion of information"*.

Organisations require a fundamental shift in thinking from simply collecting and storing information to recognising it as an asset before they will accept the concept of information governance.

10 actions that will improve the governance of information at a higher level within your organisation (see over page)

- Records Management
- Information Security
- Data Management
- Information Architecture
- IT Services
- Archives Management
- Web Management
- Business Intelligence
- Information Compliance

INFORMATION GOVERNANCE

THE GARTNER DEFINITION VIEWED THROUGH AN IM LENS

Interestingly, the Gartner definition discusses information governance in terms that are independent of technology, format, discipline, so in theory professionals in all interested disciplines could use this definition. Using the Gartner definition it appears that the adoption of an information governance approach will *"encourage desirable behaviour in the valuation, creation, storage, use, archival and deletion of information"*. Gartner identifies seven aspects of information governance. The table below discusses the characteristics identified by Gartner from an information management perspective, showing potential situations with and without information governance.

WHY INFORMATION GOVERNANCE?

Information governance has recently become a hot topic for discussion, conferences and white papers for two reasons:

◆ The increasing number of embarrassing, costly, and potentially dangerous instances of information being mistakenly released or lost through human error, poor infrastructure design or security breaches

◆ Organisations recognising that information is a core asset and that they need to better manage that asset to support strategic goals

Where information governance is being used as a strategic approach to managing information it is usually because there

Gartner characteristic	Example of what this may mean in IM context with no information governance in place	Example of what this may mean in IM context with information governance in place
Specification of decisions rights	Decisions about information activities are often isolated E.g. A manager purchases a new document management system to address a specific activity within a business unit	Decision-making processes are well understood and appropriate delegations in place E.g. There is a well-established approval process for any technology purchases
Accountability framework	There is no clear accountability for information management within the organisation E.g. There are separate reporting lines for IT, IM, data management, web management etc.	There is a senior management role that is actively accountable for information governance and management E.g. There is a CIO who manages across all information disciplines equally
Desirable behaviours	Staff are not aware of organisational expectations around the management and use of information E.g. A staff member may send out copies of data to an external party without considering security concerns	There are appropriate policies implemented and followed by staff and there is a culture of 'information awareness' E.g. Staff think about the impact of their actions with information prior to making them and understand the consequences of not following policy/guidelines
Processes	Staff are not aware of processes relating to the management of information or how managing information well could support their work processes E.g. staff members may keep all emails in their inboxes as they do not know how to archive/file them within the corporate repository/EDRMS	Staff are aware and follow documented and appropriate processes relating to the management of information E.g. staff have received training or have been provided with access to material relating to the management of their email inboxes and use of email
Roles	Managers do not have assigned roles in relation to the management and responsibility for information E.g. It is assumed by managers that the IM team are solely responsible for managing information	Managers actively engage in their roles to ensure information is managed well E.g. A manager will lead by example and ensure his/her team are following policies, procedures and having appropriate training
Standards	Each team may follow(internal and/or external) standards pertaining to their speciality E.g. the IT team in a public sector agency is assisting some staff to set up a scanning operation and they ensure it meets internal IT standards and assume that is sufficient	Staff are aware that there may be some standards that apply to all staff, or that cover different functions E.g. The IT standards provide cross-references to the relevant external recordkeeping standards from archival institutions
Metrics	Performance standards and measures are collected in an ad hoc or non-strategic manner E.g. Measures are focussed on quantitative measures only, such as 'how many documents were added to the document management system in the last month'.	Well thought-through performance indicators and metrics are regularly reported and analysed to support good decision-making and planning E.g. A combination of quantitative and qualitative measures are utilised, such as 'the number of documents added to the document management system in the last month with appropriate metadata completed'. This type of measure will be useful to assist with planning training levels in relation to the document management system.

is recognition of the value of information. How an organisation perceives the value of information has a direct bearing on how well information is managed or governed. Value may be derived from:

- A collective understanding of the organisation's dependence on information/data

- An enterprise wide understanding that management of information/data is a core competency required in many roles across the organisation

- The mandate and profile of the teams/individuals charged with managing information/data

- Where information/data management risks fit in the overall risk management profile of the organisation

The notion of information and data being a strategic asset is fundamental to an organisation's approach to information governance and its likely success in driving appropriate behaviours. Effective information governance enables an organisation to gain control of a key asset which in turn will:

- Reduce risk of misuse of information

- Decrease costs

- Improve ability to find and reuse information/data (i.e. increase organisational efficiency/productivity)

- Manage information/data effectively over its life-cycle

If information is considered to be an asset it follows that an organisation will want to protect, manage and enhance that asset. It also follows that the organisation will want to ensure that staff are following agreed behaviours in relation to its creation, use, management and deletion.

BARRIERS TO INFORMATION GOVERNANCE

Even when an organisation (or individual) understands the benefit of using an information governance approach there are still many barriers to overcome. These include the following:

- Lack of understanding of information governance at Board and Senior Management level

- Lack of appropriate information management skill sets at Board and Senior Management level

- Systemic issues around organisation structures and IM/RM reporting lines being inappropriate

- Continued silos and misunderstandings between the information professions

- Internal politics/patch protection

- Technical constraints and challenges such as security, hacking, storage issues, speed of technology changes

- Organisations not understanding or not accepting the concept of information as an asset

- Organisations not knowing what information they have and thus not knowing what to protect, manage and govern

- Legal framework – do we have the right kind of legislation in place to support and encourage good governance?

There is not yet a standard methodology for establishing and maintaining good information governance. However lessons are being learnt.

Effective information governance enables an organisation to gain control of a key asset…

PRACTICAL APPROACHES TO INFORMATION GOVERNANCE

Listed below are 10 actions that will improve the governance of information at a higher level within your organisation:

1 Establish an information governance group, or if your organisation already has one revisit its purpose, mandate and membership to confirm that its terms of reference are appropriate and that it is operating effectively check it is still running in line with its terms of reference and purpose.

2 Publicise the role of the information governance group and its decisions/actions and its place in the organisation.

3 Develop an information charter outlining expected behaviours of staff in relation to information.

4 Use short success stories published on intranets/ newsletters/posters/in presentations as a way to demonstrate how information governance can improve the management of information, save costs, reduce risk etc.

5 Work with the Board or senior management team to identify the skills needed to assist with informed decision-making at that level, perhaps initially through a discussion on information governance and its place as a business strategy.

6 Familiarise yourself with ISO/IEC 38500:2008 a standard for the corporate governance of IT, and apply to a broader information governance approach.

7 Take some time to explore the models for information governance that have been developed by professional bodies and adapt them to your organisation.

ABOUT THE AUTHOR

Kerri Siatiras is Director, SWIM Ltd (Skudder Wilson Information Management). She has over 20 years' experience in the information and records management profession. Kerri previously worked at Archives New Zealand, Telecom and Ernst & Young. She has wide experience in both the private, public and local authority sectors providing consulting and coaching services for strategy development, policy and procedures, business classification systems, records disposal, electronic document and records management and more.

Kerri is part of the SWIM Ltd team that developed the international award-winning ALGIM IM Toolkit containing a number of tools and templates for use within the local authority sector. She also helped develop the highly successful SWIM Ltd IM HEALTH CHECK☑© , a tool designed to measure the health of an organisation's RIM program.
✉ She can be contacted at kerri@swim.co.nz

8 Identify five instances of information 'failures' in your organisation and document how having good information governance in place would have stopped the failure from occurring or reduced its negative impact. Talk with the managers responsible for those events to discuss lessons learnt. For example, if there was a privacy breach because something was mistakenly emailed outside of the organisation, discuss how this may be avoided in the future and what needs to be put in place with regards to processes and behaviours.

9 Get to know the staff in the other information disciplines in your organisation to learn from each other about the interdependencies. These staff may include:
a. Data managers b. Enterprise, Data & Information architects
c. IT support d. Digitisation specialists
e. Web professionals f. Data modellers
g. Infrastructure managers h. Archivists
i. Recordkeepers/Information managers.

10 Prepare to run an information awareness campaign across your organisation to support appropriate information behaviours.

CONCLUSION

Organisations require a fundamental shift in thinking from simply collecting and storing information to recognising it as an asset before they will accept the concept of information governance. Only then will they be able to put in place successful strategic management and governance approaches. Where an organisation already recognises information as an asset information governance approaches provide an approach that may support the improvement and strategic management of that asset.

The adoption of an information governance approach provides for the collation of a series of useful and already known concepts into a strategic framework that is discipline independent. The idea of information governance encourages cross-discipline thinking, sharing and debate. information governance is as an opportunity to repackage a governance approach to information management and think across disciplines to the benefit of our organisations and information users. ❖

• Kerri Siatiras is speaking at inForum in Canberra in August on 'The recordkeeping response to 21st century information trends' as well as facilitating a workshop on 'Managing information in organisations'.

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Impact your organisation:
how information governance drives value and profits

Records management is no longer enough to manage the vast amount of enterprise content that must be governed across multiple systems and jurisdictions, and throughout long lifecycles. Information governance encompasses records management, and includes legal hold, data privacy and security, metadata management, and more. This article details how information governance not only mitigates risk and cost, but also drives value and profits, enabling records management professionals to gain visibility in the organisation and make a real difference.

By **Pierre Van Beneden**, Chief Executive Officer, RSD

Information governance: two words regularly used by top executives to describe new programs for complying with the plethora of government mandates, the proliferation of content, and the increasing legal and operational costs associated with corporate information. Information governance programs are also being developed to address new trends such as cloud computing, social media platforms, management of big data, and 'Bring Your Own Device' (BYOD) initiatives.

For many organisations, information is an asset that fuels business growth. However, there are a number of high profile cases that show information mismanagement can prove to be just as costly in terms of fines, brand reputation, and legal fees. Organisations need to find a balance between the risk that information incurs and the value it provides in order to discover buying patterns, drive product innovations and uncover new opportunities.

CONTENT HERE, CONTENT THERE, CONTENT EVERYWHERE

In recent years, there has been explosive growth in the creation and collection of content by applications and individuals. There are practically thousands of different types of information – stored in content management systems, data warehouses, physical warehouses, desktop computers, file shares, back-up archives, mobile devices, cloud services and even employees' personal computers. To complicate matters, this information is also scattered across jurisdictions – each with its own requirements, laws, and regulations.

story snapshot

What separates excellent companies from mediocre companies is the ability to properly utilise information to profitably grow the organisation.

Information governance helps map information to the value it provides and enables organisations to govern records in priority order.

Companies must have a repeatable process and platform to help update, validate, deploy and enforce policies.

Information governance helps management focus on the business mission while offering greater transparency to the board of directors, investors, customers and employees.

What separates excellent companies from mediocre companies is the ability to properly utilise information to profitably grow the organisation. Employees require simple, secure, and rapid access to information – regardless of source, format, platform or storage media.

As depicted in Figure 1, employees today rely on accurate information to do their jobs

◆ **To invest in new geographic regions** – Sales forecasts and competitive information help determine if companies should invest (or divest) in specific geographic regions. Local legal and operational requirements are critical when making these decisions.

◆ **To innovate products** – Information derived from customer and employee feedback in the development process helps enhance existing product lines and facilitates the creation of new products.

◆ **To process business transactions** – The difference between approving and rejecting a transaction can cost a company millions of dollars. Examples include loan processing and insurance underwriting.

◆ **To drive customer loyalty programs** – Call centers are now motivated to cross- and up-sell to customers. High-speed and secure access to disparate information helps customer service representatives address customer issues while selling new products and services.

◆ **To acquire other organisations** – Growth by acquisition is a proven strategy. However, after a merger or acquisition, it's critical to bring new systems (and associated information) under the governance umbrella in order to realise the full value of the transaction. This also improves customer and employee retention.

◆ **To deliver safer products to the market** – Accurate, timely and comprehensive safety reports enable companies to produce, market and distribute safe products. Safety data must meet business and legal specifications and be available to be referenced on demand.

◆ **To respond to audits and legal matters** – Litigation and audits are inevitable. A faster response to these matters will minimise the burden of these activities on resources and increase the bottom line.

ALL CONTENT IS NOT TREATED EQUAL

A common mistake made by organisations is a failure to differentiate information handling processes and policies based on the value of information being governed. Certain business units (and individuals) create information that is inherently more valuable than others. For example, would you treat information from your vice president of sales the same as you would treat content from a marketing intern? Your information governance strategy must account for the value of information in how it is classified and accessed.

Of special importance is information related to future revenue. For example, a pharmaceutical company will place a high priority on protecting information related to future products because there is no patent protection. It is vital for companies to have systems in place to protect sensitive content such as:

◆ product roadmaps

◆ manufacturing plans

◆ vendor supply lists

◆ marketing and promotional strategies.

Information governance helps map information to the value it provides and enables organisations to govern records in priority order.

Figure 1

SHARING AND UNLOCKING INFORMATION

There have been hundreds of case studies describing the importance of collaboration and how it improves innovation. Microsoft SharePoint has become the de facto standard for collaborating and sharing documents. Employees rely on SharePoint to plan new products, share ideas, manage complex projects and streamline processes.

Since SharePoint has become the central hub for employees, it's critical that users have simple and relevant access to SharePoint and non-SharePoint information – all within SharePoint's user-friendly interface. Companies need to keep track of what information is created, stored, and accessed in SharePoint. By providing these capabilities, SharePoint becomes a much stronger platform for your organisation.

Information governance enhances existing SharePoint deployments by:

◆ enforcing proper governance controls without impeding the benefits of SharePoint

◆ allowing all information to be securely and properly shared across departments, jurisdictions and systems

◆ moving relevant files from desktops and shared drives to SharePoint – automatically.

Some employees still rely on email for collaboration. Emails (and attachments) have significant value to the business – whether they contain contract terms, meeting notes, or employee opinions on a given topic. Email now requires strict governance – and as a result email archives must also be included in your information governance platform.

MEET THE NEW EMPLOYEE

Thanks to mobile and cloud technologies, automatic 'out of the office' messages are a thing of the past. Employees count on using devices to collaborate on documents, take meeting notes, create presentations and collect data in the field. Employees are using their own smart phones and tablets to conduct business, a practice referred to as 'Bring Your Own Device' or BYOD – a trend that continues to grow.

While the actual hardware may belong to the employee, corporate information does not. Data residing on the device belongs to the organisation – creating a new twist to information governance initiatives. As a result, companies need to keep employees happy and productive while protecting and leveraging the information they create and consume.

This is just one of the reasons cloud technology has become acceptable for many organisations. The cloud gives the company centralised control of information while allowing users to access that information from any computer or device. It enables the IT organisation to respond quicker to business requirements.

Figure 2

DEFINE ONE POLICY VERSUS DEFINING POLICY ONE TIME

Policies reflect business and jurisdictional requirements so that information is automatically managed and properly used. There is no longer a need to have policies spread across the organisation. A single policy engine should support all of the organisation's governance controls – retention, disposition, legal hold, data privacy, and security.

As shown in Figure 2, companies require a digital hub of all governance policies across jurisdictions and information stores including:

◆ desktops and shared drives

◆ enterprise content management systems

◆ databases and data warehouses

◆ email systems

◆ cloud-based applications

◆ social media platforms

◆ physical warehouses.

Also, policies must be auditable, enforceable and measureable. It's better not to have a policy than to have a policy that does not get embraced and enforced in the business. Policies constantly change due to new business requirements, regulatory demands, rising costs, and high-profile litigation.

Companies must have a repeatable process and platform to help update, validate, deploy and enforce policies. Policy changes should be propagated without negatively impacting users and operations. The companies who do this best are more competitive and successful.

OUTPERFORM THE COMPETITION WITH INFORMATION GOVERNANCE

Given all of these benefits, it is not surprising that many organisations are interested in implementing information governance. But where to begin? The place to start an information governance initiative is to establish a steering committee with all the stakeholders – including executives and representatives from Records Management, IT, Compliance,

After a committee is formed, it's important to map information to revenue and operations

Legal, even the Business Units themselves. Companies sometimes forget to include representation from the business, a costly mistake down the road.

After a committee is formed, it's important to map information to revenue and operations. The steering committee outlines the scope, timeline, budget, and most important, the benefits the company is expecting to receive from information governance. By rolling out information governance from the top, companies are able to avoid the struggles between divisions that plague decentralised companies.

Information governance helps management focus on the business mission while offering greater transparency to the board of directors, investors, customers and employees. Everyone is on the same page in terms of how information is governed.

Employees are equally rewarded by having information that is accurate, current and in a suitable format for their use. It allows them to be more efficient and to make authoritative decisions. Furthermore, removing duplicate and unnecessary content helps reduce the time needed to find the valid information that is required for making critical business decisions.

In addition to enriching employee productivity, governing all content consistently drives higher profits. Administration and operational costs are lowered due to multi-jurisdictional policy management and automatic enforcement. The entire process is modernised, improving efficiency and adaptability to changing conditions. Finally, retention management optimises the cost-effectiveness of storage platforms and legal fees are reduced in case of litigation. These are just a few of the ways that information governance contributes to improvements in the bottom line. ❖

ABOUT THE AUTHOR

Pierre Van Beneden is Chief Executive Officer, RSD. He has over 25 years' experience driving growth at software companies through leadership and a results-focused approach. Prior to joining RSD, Pierre was VP EMEA for Adobe Systems Inc. From 1995 to 2001, Van Beneden was with Lotus Development Corporation where he served in a variety of executive roles. Prior to his time with Lotus, Pierre spent almost a decade at Oracle Corporation driving global growth strategies. He holds a Ph.D. in business management from Paris University and a Masters degree in the same subject from Paris Dauphine.

RSD solutions for information governance, output management, and document archiving and retrieval support millions of users worldwide.

EMBRACING THE DIGITAL FUTURE

Kevin Dwyer and **Michelle Linton** caught up with Ros Ball – Shoalhaven City Council's records manager – after her dynamic presentation at the TRIM User Forum 2012 where she spoke of Shoalhaven's journey to achieving highly efficient and accurate data capture into an Electronic Document and Records Management System (EDRMS) using the latest in scanning software.

Ros Ball

The halls of Harvard University have a history of overcoming resistance to change. The factories of Yokohama are renowned for continuous improvement. Silicon Valley is where we look for technology innovation. And the Archives Offices of Canberra, Surrey, Washington or Pretoria have influenced business to recognise the benefits of metadata.

But where in Australia would you start a search for an organisation and individuals who have thought deeply about all these critical elements in recordkeeping, and achieved great success? The City of Shoalhaven on the beautiful southern NSW coastline, best known as stunning tourist destination, is unlikely to have come to mind, but that's where we found another example of great progress in fully digital recordkeeping.

Shoalhaven City Council administers and provides services to a population of 96,000 people living in 49 towns and villages south of Sydney. It boasts 300,000 hectares of national parks and state forests, 109 beaches along 1,000 kilometres of coastline, and a wide range of businesses from manufacturing to tourism which caters for over 1.3 million visitors a year.

That makes the people, roads and tourism to care for on par with any large council in Australia. All in all, there are a lot of records to be kept in Shoalhaven.

Ros Ball is Shoalhaven City Council's current records manager. Ros first found her forte in records in 1998, and has embraced both the theoretical and technological aspects of the modern role, building up an impressive legacy of achievements.

RESISTANCE TO CHANGE

Back in 1998 the introduction of TRIM as the EDRMS at Shoalhaven was not smooth. Most people resisted the change in the way they had always done things. At that time Shoalhaven made the decision to start slowly, with the registration of physical records the priority. By 2001 they were ready to start turning digital.

"We have deliberately taken a slow approach to change," says Ros. "We let people know what the technology can do and what the future holds and give them a taste of what is possible. We show them the benefit and then wait for them to ask for it. When that happens, we drive the change.

"When we started scanning in 2001 we actually waited until the technology caught up and delivered the benefits that we knew would make it easier for us to convince a reluctant audience.

"We met resistance at each point of adoption of new technology. Resistance was expressed in many forms, from the familiar 'That's not the way I have done it before' to the more specific, 'It takes me more mouse clicks'."

In change, people are often more afraid of what they have to give up than what they have to learn new. People build myths around the use of TRIM as a means of defending why they do not want to change.

Ros and her team have had to systematically dismantle the myths in order to regain momentum to move on. For example, the myth existed that Shoalhaven's records were much more secure in physical storage locations in hard copy than in TRIM in digital format. Dismantling that myth through demonstration of the security features for individual records and for locations and the benefits of an audit trail was necessary before progress could be made on scanning documents.

Ros has found over time that technology change has become easier for people. Much of this has come from the pervasive nature of smart phone and tablet technology in people's lives outside of the Council.

"People are requesting mobile solutions for iPhone or ipad. These are people who have been negative about moving to a digital future, but can now visualise how the technology may fit into their work life." That has increased the acceptance that change is the norm in the Council when it comes to recordkeeping.

LEVERAGING TECHNOLOGY

Shoalhaven City Council's success is also a story of using technology to drive out errors. In what might be described as a lean manufacturing approach, continuous improvement in technology has been used specifically to achieve improved capture of metadata.

Ros states the records unit goal simply as, "To streamline our processes by using technology to enter data into a record." Councils need to capture a lot of metadata from forms, which is mundane, high error work. Local governments have been pushed too achieve more with less and that premise drives Shoalhaven's approach.

Over several years, and through a staged approach, the Council has transformed their methods of capturing forms by building more technology into the solutions coinciding with the maturing of their staff capability and willingness to accept new processes. Physical forms, once collected from various sites which took several days to be registered and processed and were error prone, are now web-based or OCR captured into TRIM from the point of receipt. Some of the records registration responsibility has been devolved leaving Ros and her team with time to work with business in other areas for improved efficiency.

The results go beyond the saving in Council staff time. For instance Ros says, "Most development application records are captured digitally and displayed on the web. Not only are we capturing them faster with fewer errors, but people do not have to come into the Council building now. This makes it more productive for everybody.

MAKING METADATA IMPORTANT TO ALL

Ros has an intrinsic understanding of the value of metadata that we have not often seen before. "Metadata is very important to us. If we can use technology to acquire metadata at source and in a standard format, we reduce errors, reduce waste, increase productivity and reduce risk. Getting the right metadata in consistent format enables us to have systems collaborate more easily which opens up the next frontier in innovation for us. It makes it easy for our customers and clients to deal with us."

Ros is by nature, a passionate and vibrant personality with a delightful sense of humour. This has helped her in engaging with people on the mundane subject of metadata, and once she has gained their attention she's taken every opportunity to educate people in the business on utilising metadata in the EDRMS. This change in people's attention to elements of an EDRMS usually only of great interest to recordkeepers underlines the achievements of their approach to managing change.

REFRAMING COMPLIANCE TO GET BUDGET

In the past we've made it plain we believe too much reliance is placed on compliance with regulation as the rationale for convincing senior management teams to part with budget money. We believe that the records management fraternity need to be more knowledgeable and skilful in creating financial business cases based on reducing risk and increasing productivity. Ros had a twist on that premise which resonated loudly with us.

"I sell projects based on their ability to improve collaboration, reduce risk and reduce errors. However, I link all of those points to the legislation and regulations. I don't shy away from compliance.

ABOUT THE AUTHORS

Michelle Linton, Managing Director, Linked Training
Michelle is a Learning & Development professional with 24 years' experience in the planning, design and delivery of training programs. Michelle has developed and delivered innovative, outcome focused EDRMS training for over 30 government and private organisations since 2005. Michelle's pragmatic approach to learning strategies leading to application adoption has been enthusiastically welcomed by the industry, and she is a regular speaker at RIM events and contributor to industry magazines. Linked Training is the training partner in the REX project which was awarded the J.Eddis Linton Award for Excellence – Most outstanding group in 2010.
✉ She can be contacted at Michelle@LinkedTraining.com.au

Kevin Dwyer, Director, Change Factory
Kevin is a Change Management professional with more than 30 years' experience in the planning, design and delivery of change management programs. Since 2001, and the establishment of Change Factory, he has been involved in many Change Management projects ranging from re-engineering of customs processes to reduce risk to creating and revising performance management systems to improve customer service outcomes at five-star resorts. His first EDRMS project was as the Change Management partner for the REX project which was awarded the J.Eddis Linton Award for Excellence – Most outstanding group in 2010.
✉ He can be contacted at Kevin.Dwyer@changefactory.com.au

"What I do say is that the laws are there for a reason; to protect us from increased risk, low levels of collaboration and unacceptable error rates. I reframe the law and its intent into real risks that our senior managers can recognise.

"I show them, for example, that good metadata, which we are required by regulation to collect, reduces errors and allows for better decisions as all relevant information is as a result of good metadata easily discovered. I also show them that having good metadata saves time in finding records but more importantly saves time in making decisions and communicating them back to our customers and clients.

At the same time as gaining approval for business cases and the required budget Ros is delivering powerful education to senior management on the legislation and how the EDRMS supports best practice delivery of services.

FUTURE CHALLENGES

So what does Ros believe the future technology challenges are for records management?

She sees system collaboration being on an endless path. "Technology will undoubtedly be more integrated. It will be like being in a mosh pit at a concert, with systems moving in rhythm with each other without any one system being in control", Ros suggests. "There will be touch points between technologies whether you realise it or not or want it or not."

Ros thinks this will have its advantages in that collaboration will be easier and data collection for records purposes easier. It will have its disadvantages in that keeping track of updates and their impact on other reliant technologies will take increased effort and focus until the technologies themselves are adapted to self-regulate their interconnectedness.

"Although mobile technology will not make us paperless it will make us more paperless. That's a good thing. Capturing more data at source will further reduce variations and therefore reduce rework and cost to the Council and our customers and clients."

Ros believes one of the biggest challenges will come from the ownership of data. Cloud computing will just be the way we do business. The difficulty that Ros sees is explained by her own rhetorical questions, "In that context, who owns a post I put onto the Council Facebook page? Do I own the post, or does Facebook own, or the Council or the cloud computing host? Every post is a record. Who owns the record?"

Not only is Ros concerned about ownership but also with jurisdiction as the Council, their client, the website owner and the host are likely to be in different countries with different laws applying.

With the continued growth and commercial use of social media, Ros sees this as an issue which will need to be solved, but not by the innovators of Shoalhaven City Council alone. ❖

"We let people know what the technology can do and what the future holds and give them a taste of what is possible"

Digital archives at State Records NSW

The background

State Records NSW's reported on its digital archives project in *iQ* magazine in May 2011. In that article, the ambitious plan was outlined to 'turn State Records NSW into a truly digital archives authority' with the implementation of the State's first digital archives solution. The author of that article spoke not only about the protection and preservation of digital archives, but of the need for collaboration, attention to records use and interpretation in a period of information abundance, and the value of well-captured and managed contextual information around records and related information that comes from an archival perspective.

The present

Two years on and State Records is in the final phase of the digital archives project, and expects to shift to 'business as usual' for digital archives in the second half of 2013. As it moves towards this next milestone, the authors of this article reflect on the ways in which State Records has worked to reach the goals set out in 2011.

By **Cassie Findlay and Paul Elliott**

Our approach to digital archives is based on years of advising and working with NSW Government agencies on the challenges of digital recordkeeping. Our Future Proof strategy, established in 2007, seeks to ensure that:

◆ the New South Wales government documents its business via the creation of robust, useable and trustworthy digital records

◆ digital records are created and maintained in environments that have been adequately assessed and treated for risks

◆ people and government have ready access to digital records documenting the business and memory of the State of NSW, and

◆ the State's digital archives are protected, preserved and accessible[1].

To achieve these goals we seek to provide timely advice on recordkeeping issues, including new and emerging technologies, utilising a variety of delivery modes, offer training in digital recordkeeping and facilitate regular workshops for information sharing on digital recordkeeping issues. As a result of the experience we have had implementing this strategy, we understood early on in the digital archives project research phase that our approach to digital archives could not be 'one size fits all'. Digital recordkeeping systems vary widely across government; EDRM systems that mirror file-and-document models to clouds based collaborative systems for doing business, and everything in between – including unmanaged network drives. Not only that, but we were also well aware that no two NSW government agencies are identical in terms of their resourcing or in-house recordkeeping expertise. Therefore, we decided, the way that we engaged with agencies on digital archives matters needed to be tailored to both the records concerned and the agency itself.

MIGRATION PROJECTS

In 'Systems migrations to archives – a research paper from the digital archives team', published on the Future Proof blog in January 2012[2], we described an approach and a way of thinking about the process of making records part of the State's archives that moved away from a focus on transfer of custody. The paper explored the problems that arise when the transfer process interferes with the capture of recordkeeping systems in all their complexity, by paying too much attention to file level management and not enough to the placing of records in context. We proposed that our digital archive would be a digital recordkeeping system for other recordkeeping systems, and one that accommodated complexity rather than seeking to strip it away in the interests of a more automatable process.

What does this mean? It means that rather than designing a single workflow through which all records destined to be part of the archives would be processed, we decided to treat each set of records proposed for transfer as a migration project. We see this approach as having a number of benefits:

◆ It means that we can take advantage of existing systems migration tools and techniques, developed for business purposes but equally useful in our context.

◆ We can develop tools and advice that are useful to agencies for system migrations generally, not just those involving records identified as State archives.

◆ Systems migration methodologies place a strong emphasis on understanding the semantics and structure of metadata, which is key for the proper management and use of digital records, especially through systems change.

◆ There is a strong body of existing guidance on the migration of recordkeeping systems available from State Records[3] that we can draw on.

DIGITAL ARCHIVES MIGRATION METHODOLOGY

In taking a migration project approach it was identified that we needed some kind of structure in place to manage the process. We investigated different project management methodologies, reviewed the State Records guidelines on managing migrations[4] and referenced other available materials including the 'Producer-Archive Interface Methodology Abstract Standard (2004)' by the Consultative Committee for Space Data Systems which was also responsible for developing the Open Archival Information System (OAIS) standard[5].

This research work formed the basis for the development of the migration methodology which is a project based approach for managing migrations. The migration methodology provides structure, accountability and consistency in managing migration projects as well as risk identification and mitigation. Based on the complexity of the planned migration, this methodology can be scalable and flexible. This means the structure and activities contained in the methodology can expand to encompass and manage the complexity involved in the migration or contract where a migration may be more straightforward and/or smaller in size.

Using a project management framework, the migration methodology is split into stages to provide better management of actions, activities and decision making and allows for more effective prioritisation of resources for those involved in the migration project.

The digital archives migration project methodology comprises three stages with each stage containing a number of activities:

Tools adopted will be integrated into a 'Digital Archives Dashboard' available online to agencies ⟹

1 **Project Start-up:** stage activities include project initiation, information gathering, drafting the project plan and approval of the project plan.

2 **Migration Plan:** stage activities include assessment activities such as preservation planning, metadata mapping and assessing the migration strategy, drafting the migration plan and approval of the migration plan.

3 **Migration:** stage activities include pre-migration testing, the migration process, post-migration testing and project completion.

The two key documents that are delivered using the migration methodology are the project plan and the migration plan. The project plan is designed to manage the overall project and the migration plan is designed to manage the migration process. Both documents require approval from key project stakeholders. Assessment activities are based on decision making and the use of tools and services to determine the migration strategy for each migration project. The development of preservation pathways and the metadata registry (see Digital archives tools and services, below), as well as the capture of lessons learned from previous migration projects will inform decision making.

DIGITAL ARCHIVES TOOLS AND SERVICES

When State Records started building a whole of government digital archive for New South Wales, we committed to publishing new software developed for the project as free and open source software. We rely heavily on software and web services shared freely by members of the digital preservation community, such as the PRONOM technical registry[6] from the National Archives (UK) and Xena from the National Archives of Australia. We hope, in turn, that the software we publish will prove of use, or of interest, to others.

Why develop new digital preservation tools? We have been conscious of the importance of not 're-inventing the wheel' and, wherever possible, are adopting or adapting existing tools. This avoids waste, pools resources, and means we can take advantage of the great software that is already available. However we do require a software solution which supports our general approach to digital preservation and this demands:

◆ a flexible workflow solution that can be customised for each digital archives migration project

◆ a flexible approach to file format conversion that can be adapted according to the needs of each digital archives migration project

◆ and a flexible approach to managing metadata.

Accordingly we are developing three key tools: *the Digital Archives Workflow Controller*, the *Digital Archives Preservation Pathways Registry*, and the *Digital Archives Metadata Registry*. These are made available (in beta) under the GNU General Public License (version 3) on State Records' Github repository[7].

Digital Archives Workflow Controller
https://github.com/srnsw/Workflow
A flexible platform for orchestrating digital preservation workflows. Custom workflows are defined for specific digital archives migration projects. These workflows are submitted to the workflow tool in a custom XML format along with digital records. The workflow tool then calls out to different applications and web services as defined in that XML file. The workflow tool has both command line and web service interfaces.

Digital Archives Preservation Pathways Registry
https://github.com/srnsw/Preservation-Pathway
This application records preferences for file format conversion operations. Basically, a recommendation to turn an input file with X PUID (using IDs from the National Archives PRONOM registry) into the format defined by Y PUID. Preferences can be registered for different purposes e.g. for "access" purposes we might recommend DOC->PDF, but for "preservation" purposes we might suggest DOC->ODF (just an example, not an actual policy in the registry).

Available publicly as a handy reference for the NSW jurisdiction (so that an agency that encounters records in a certain format can quickly find State Records' recommended pathway for that format). It also produces machine readable output (JSON) that the Digital Archives Workflow Controller tool can consume (to automate format conversions where appropriate).

Digital Archives Metadata Registry
https://github.com/srnsw/Metadata-Registry
The Digital Archives Metadata Registry is a publicly accessible web service capable of:

◆ allowing Digital Archives staff to progressively register preferences for published metadata terms (e.g. Dublin Core) to represent common metadata elements in the digital archives

◆ allowing Digital Archives staff to progressively coin new terms (by providing a URI and description) to represent metadata elements in the digital archives for which no suitable published term can be identified

◆ informing NSW government agencies wishing to transfer digital archives of State Records' metadata preferences

◆ informing users accessing the digital archives of the full set of searchable metadata fields in the system

◆ providing a 'best practice' reference for NSW government agencies wishing to standardise metadata used in agency recordkeeping systems, and

◆ providing a useful resource for the digital preservation and recordkeeping communities.

These tools and other third party tools that we adopt will be integrated into a 'Digital Archives Dashboard' available online to both agencies and State Records staff which will serve as both a step by step way to navigate the methodology and a recordkeeping system to capture all analysis and additional documentation about the records and the project. This information will serve as a key component of the knowledge base from which we will draw lessons learned and practical, reusable methods for future projects. Importantly, its resources will be available to agencies seeking to carry out migrations for their own digital continuity purposes, whether or not records are eligible to be retained as State archives.

As we near the next major milestone for our project there are a variety of strands of work coming together for State Records' digital archives project. However we are bearing in mind that our methodology and framework of tools and guidance should not be set in stone but rather are a continuing work in progress as we learn and build experience.

PILOT MIGRATION CASE STUDIES

Does the migration methodology work? In the early days of the development of the migration methodology there was key stakeholder involvement and internal workshops to gain feedback which lead to a number of changes to the methodology. As part of the development of the migration methodology we identified that it was important to 'road test' the methodology to see how it would operate in live environments.

Similarly our architecture of tools and processes was untested by real, practical experience. This would be the role of our pilot migration projects. These pilots would enable us to create live test environments that would provide not only the means of testing the migration methodology but also of further developing the Digital Archives system and processes. Suitable pilots were identified based on existing communications with NSW government agencies.

NSW FAIR TRADING
– BUSINESS REGISTRATION RECORDS

The function of business registration in NSW that was managed by NSW Fair Trading passed to the Commonwealth in early 2012. As a result, NSW Fair Trading ceased to manage the function but continued to manage business registration records; a number of which had not been migrated to the Commonwealth. These records were managed in the Business Registration System (BRS), the Business Registration Imaging System (BRIS) and imaged business registration records held on microfiche. The BRS is an Oracle database and BRIS is a customised version of Objective.

The inclusion of microfiche in the project was the catalyst for determining how we would approach hybrid projects involving both digital and physical formats. This approach would have to address how we would work with both internal and external stakeholders in the project.

We identified that a project plan that could manage any type of format records was needed. This was a significant change to the methodology which had previously encompassed a streamlined project start-up process followed by assessment activities.

Working with the agency and internal stakeholders, a suitable structure for the project plan was established and approved by key project stakeholders. The project plan has enabled a structured planning approach to the various activities that will be involved in this pilot migration project and the roles, responsibilities and timeframes for project deliverables. Currently we are assessing the BRS database schema as well as export options from Objective for customised metadata and files relating to business registration documentation. There are also a number of access requirements that will need to be managed including access to business registration information that was already available on the NSW Fair Trading website.

"We identified that a project plan that could manage any type of format records was needed"
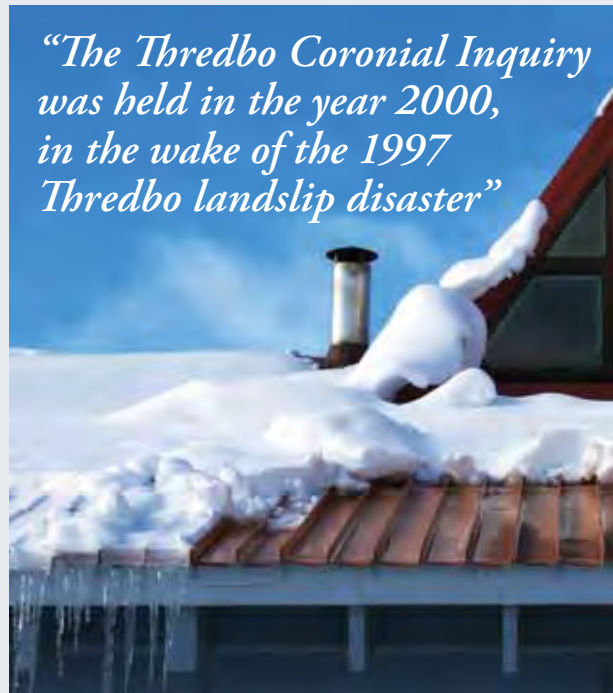
OFFICE OF ENVIRONMENT AND HERITAGE (OEH) – THREDBO CORONIAL INQUIRY

The Thredbo Coronial Inquiry was held in the year 2000, in the wake of the 1997 Thredbo landslip disaster. It involved the participation of multiple parties, including the NSW National Parks and Wildlife Service (NPWS), who had responsibilities for the land on which the tragedy occurred. The inquiry used a Lotus Notes database as the records repository for its deliberations, including all papers, statements and transcripts of the proceedings. It used a copying service, AUSCRIPT, to locate and scan all records from all parties onto the database, including NPWS records. The database consists of 12.5 Gb of data and almost 20,000 scanned documents.

Work on this system to date has involved setting the parameters of the project in a mutually agreed project plan; talking with OEH records and information systems staff to understand how this database related to other records of the Inquiry and NPWS's business processes, as well as analysing and thoroughly documenting the way the Lotus notes interface organised and presented the records, and its metadata schema. The investigation phase has also involved assessing the suitability of a copy of the database in an SQL format prepared by OEH for their own purposes. This presents a promising option for the capture of the data in a more manageable format. We are also considering the range of document formats the database contains and whether in some cases the creation of additional copies in better formats for preservation or access purposes will be required. Decisions made to create such copies will be reflected in our Preservation Pathways register. A key activity is the mapping of the database metadata to our preferred terms and the registration of new terms in our metadata registry. Effective management of this metadata will be essential

"The Thredbo Coronial Inquiry was held in the year 2000, in the wake of the 1997 Thredbo landslip disaster"

for managing the critically important access restrictions on the records, which include reports and transcripts that will be open to public access right away, but also highly sensitive personal information that is to remain closed.

A number of other pilot migrations are underway including a Commission of Inquiry database and a number of smaller collections of digital files in a range of formats including a/v files, simple Office formats and social media records. All are garnering us invaluable experience in dealing with digital archives migrations and in refining our approach and systems. ❖

ABOUT THE AUTHORS

Cassie Findlay is the Project Manager, Digital Archives at State Records NSW, having previously worked in State Records' Government Recordkeeping program. She is also currently a member of the National Council of the Australian Society of Archivists and Project Lead for the ISO review of the International Standard on Records Management, ISO 15489. Cassie has written and presented extensively on digital recordkeeping issues, and is a co-founder of the Sydney based recordkeeping and archives discussion group the Recordkeeping Roundtable.

Paul Elliott is a Project Officer in the State Records NSW Digital Archives project. Before joining State Records in 2011, Paul worked for three years as an Archivist/Project Officer at the NSW Government agency Land and Property Information (LPI) where he worked on large scale digitisation/archival transfer projects and EDRMS roll outs. Prior to that, Paul worked for 11 years in a variety of roles in music copyright administration at the Australasian Performing Right Association (APRA) Ltd.

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6 PRONOM Technical Registry http://www.nationalarchives.gov.uk/PRONOM/Default.aspx Accessed 4 April 2013
7 State Records NSW on GitHub https://github.com/srnsw Accessed 4 April 2013

inForum 2013:
You are invited to attend...

RIM Professionals Australasia's 30th convention, inForum 2013, to be held at the National Convention Centre, Canberra from Sunday 8 to Wednesday 11 September 2013.

inForum is the peak industry event for information professionals in Australasia offering a diverse but relevant multi-stream program, a trade exhibition and multiple networking opportunities.

The theme 'Information Governance' explores a holistic approach to managing corporate information by implementing processes, roles, controls and metrics that treat information as a valuable business asset. The goal of a holistic approach to information governance is to make information assets available to those who need it, while streamlining management, reducing storage costs and ensuring compliance. This, in turn, allows the company to reduce the risks associated with unmanaged or inconsistently managed information and be more agile in response to a changing marketplace.

2013

also represents Canberra's Centenary and as Canberra is Australia's information capital as well as its capital city, inForum 2013 features site visits to:

◆ National Film and Sound Archive

◆ National Gallery of Australia,

◆ National Library of Australia,

◆ National Archives of Australia,

◆ Australian War Memorial and

◆ National Museum of Australia

Each site visit includes an exclusive presentation, behind-the-scenes tour and a viewing of their current exhibition.

inForum also features six optional workshops focusing on information governance and people skills including a breakfast session on Coaching and Mentoring skills for records management. Every inForum offers something different and unique however 2013 will be even more special and one you really do not want to miss.

Other features of inForum 2013 include the traditional networking program including the Newbies Orientation session, Welcome Reception, Listserv Drinks, Branch Networking Dinners, Wednesday Prize Draw Lunch and Gala Awards Dinner with this year's theme 'A Garden Party' honouring Canberra's famous Floriade festival which commences the week after inForum.

The inForum 2013 program was released in March and you can view it and register via the inForum website: www.inforum.net.au

In addition selected presentations from inForum Darwin 2011 and Melbourne 2012 are available to view for free from the inForum website. And what would inForum be without its extensive and completely RIM relevant trade exhibition which will also be open to the public during selected times.

Floriade

Clockwise from top left: National Gallery of Australia; National Museum of Australia; National Library of Australia; National Film and Sound Archive; Australian War Memorial

FOR MORE INFO
Visit the conference website
www.inforum.net.au

Featured speakers

Keynote: Evolving RM to information governance
to protect your organisation
Speaker: Stephen Ludlow, OpenText, Canada

Bio
Stephen Ludlow leads OpenText's eDiscovery and Information Governance practice. He helps customers transform the way they manage information. By working closely with OpenText sales, services and R&D, he ensures that customers address compliance and litigation risks, storage and eDiscovery costs, all while deriving maximum value from their information assets.

Prior to leading OpenText's eDiscovery practice, Mr. Ludlow managed Open Text's Risk Management and Compliance application, working with Fortune 500 companies to deploy enterprise solutions for Internal Controls and Sarbanes Oxley compliance.

Before joining OpenText, Stephen was an Information Management consultant focused on Canadian Federal Government clients.

Abstract
Have records managers been fooling themselves into believing that they have content under control? Is simply managing official records enough to protect the interests of the organisation? With the pervasiveness of electronic content, new risks like intellectual property loss, fraud, and corruption can be detected in content and controlled with sound information governance policies. As records management and IT best practices converge towards information governance, new strategies for capturing and classifying more than just the official records need to be explored.

Keynote: 'Always-on' compliance: The value proposition for information governance
Speaker: Rory Staunton, Strategy Partners, UK

Bio
Recognised as a leading IT industry analyst in Europe, Rory has provided extensive IT advisory services to major European and North American organisations in the governmental, pharmaceutical, finance, and utility sectors. He is also a much sought-after speaker at conferences and frequently consults at Board level on IT strategy.

Prior to founding Strategy Partners, Rory was Research Director at Gartner Group Europe, responsible for establishing Gartner's Integrated Document and Output Management (IDOM) service in Europe.

Previously, Rory was Information Systems Manager at Imperial Chemical Industries (ICI) where he was responsible for technical computing projects, generating IT strategy, performing cost/benefit analyses, running its records management services and implementing image processing and document production systems.

Rory is formally an International Board member and Fellow of AIIM International, the USA-based Association for Enterprise Content Management, and is member of the Executive Committee of the DLM Forum, the European Commission-sponsored body that generates information standards in Europe.

Abstract
A fundamental change of mindset is needed to address the needs of ever-demanding regulators in all government and commercial organisations. Every employee must 'get ahead of the compliance curve' by making compliance an everyday, routine, 'always-on' part of the culture and infrastructure. This is the key to information governance which defines the set of integrated techniques, practices, policies, standards and systems that directs the purchase, design, implementation and usage of all information systems, so that they are 'fit for purpose' in meeting compliance regulations, at the lowest available cost.

The systems and services that will emerge require organisations to assess the value and risk of their information from cradle to grave, not just when archiving. This requirement will massively increase the value of records managers that embrace the discipline needed to record boxes of paper and extend it to manage cloud systems that span every regulatory reporting requirement that CEOs need, to keep them out of prison.

The presentation will show how the coincidence and combination of the recession in Europe; new technologies including cloud and mobile; increased regulation and new approaches to records management have created opportunities for records managers to bring their expertise to businesses and IT in a proactive way. It will address the following:

◆ **Technically:** What information governance looks like and how it enables organisations to *control* their information

◆ **Operationally:** How organisations can *comply* with current and new regulations without 99% boredom or ignorance, 1% blind panic

◆ **Financially:** How organisations can *compete*, in manufacturing mining, pharmaceutical, government HR, environmental and financial regulations ❖

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ANNUAL GENERAL MEETING
The 38th AGM will be held at 4.30pm on Sunday 8 September 2013 in the Swan Room at the National Convention Centre, Constitution Avenue, Canberra. Professional members who cannot attend should submit a proxy with their apology. Professional members who are based in Canberra but are not attending inForum are asked to make an effort to attend the AGM.

CALL FOR ENTRIES

J EDDIS LINTON AWARDS

For excellence in records and information management, the J Eddis Linton Awards recognise outstanding contributions to the profession in Australia and New Zealand in three categories:

Ezescan Most Outstanding Group

Aimed at RIM Professionals Australasia members who as a group have achieved RIM excellence and contributed highly to the profession, open to groups, committees (other than RIM Professionals Australasia committees), vendors, business units or consultants (whose work has not been performed for personal gain).

This award can be self-nominated or nominated by another party.

Information Proficiency Most Outstanding Individual

Aimed at those members who have achieved excellence in RIM and contributed highly to the profession. Can be self-nominated or nominated by an independent person or group. If you feel you have – or know a RIM Professionals Australasia member who has contributed significantly in the workplace or to the profession as a whole, you are urged to send in a nomination.

The nominator is required to provide a summary in no more than 1000 words as to why they are nominating. They may be required to meet with the awards judging panel, and may be asked to provide documentary evidence.

Records Solutions Student of the Year

Awarded to a student who has achieved excellence in educational studies in records and information management. Open to fulltime and part-time students who have completed a dedicated records and information management course in the previous 12 months (July to June).

NOMINATIONS

Eligible nominations in each category will be shortlisted and the shortlisted nominees will receive a complimentary ticket to attend the RIM Professionals Gala Awards Dinner on Monday 9 September at the National convention Centre, Canberra. The final winner in each category will receive a $500.00 Coles-Myer Gift Card and a plaque valued at $250.00.

➲ **For more information about the J Eddis Linton Awards and an application form, for all categories, see the RIM Professionals Australasia website: www.rimpa.com.au/grantsandawards/linton-awards/**

ENTRIES CLOSE 1 AUGUST

RECALL ARTICLE OF THE YEAR AWARD 2013

Introduced in 2004 and sponsored by Recall since 2012 the Recall Article of the Year Award encourages and recognises quality written contributions to RIM Professionals Australasia's publication *iQ* Magazine.

To be eligible the author must be a member of RIM Professionals Australasia and have an original article published in an issue of *iQ* from November 2012 to August 2013. Eligible contributions are automatically nominated to the award. The *iQ* Editor shortlists the nominations and authors of the shortlisted contributions will receive a complimentary ticket to attend the RIM Professionals Australasia Gala Awards Dinner being held in Canberra on Monday, 9 September 2013, where the final winner will be announced.

The overall winner of the Recall Article of the Year Award will receive a $300.00 Coles-Myer Gift Card and a framed certificate. ❖

JIM SHEPHERD AWARDS

The Jim Shepherd Award is awarded to vendors in recognition of vendor/trade support of RIM Professionals Australasia and in recognition of services to the records management industry.

Previous winners include Tower Software, Objective Corporation and Recall.

A nominee must demonstrate the following:

◆ A minimum of five years continuous sponsorship of RIM Professionals Australasia at *both* Branch and National level (sponsorship can be financial or 'in kind').

◆ Active involvement in advancing the records management industry.

◆ Your product or service must be specific to the records/information management industry.

◆ Corporate membership of RIM Professionals Australasia.

◆ Applications covering these criteria and demonstrating the company's suitability must be submitted by either

an individual RIM Professionals Australasia member (who does not work for the company) or by a Branch Council, Chapter or SIG of RIM Professionals Australasia.

◆ Self nominations will be accepted, but must be endorsed by a professional RIM Professionals Australasia member who does not work for the company.

◆ The nominator is required to provide details of the nominee, incorporating the award criteria, in no less than 1,000 words.

The winner will be announced at the RIM Professionals Australasia Gala Awards Dinner being held in Canberra on Monday, 9th September 2013 and will receive a plaque valued at over $500.00 ❖

➲ **For more information, see the RIM Professionals Australasia website: www.rimpa.com.au/ docs/awards/fed/shepherd/index.cfm**

ENTRIES CLOSE 1 AUGUST

CHANGES ARE COMING!

All awards criteria are currently under review and new or amended criteria will be introduced in 2014.

Recordkeeping:
the evidence base for corporate social responsibility?

Multinational companies publish sustainability reports[1] to provide information on their activities impacting the environment in which they operate. Since records are evidence of corporate activities, recordkeeping principles and programs should, logically, be a critical element in sustainability reporting activities. However, critics contend that these reports lack credibility and quality information[2], and that some indicators are not always measurable. This article shows that companies are not currently leveraging recordkeeping programs to support sustainability activities.

By **Ineke Deserno**

In an ever changing business and technology environment, companies around the world are subject to greater public scrutiny by stakeholders and by those impacted by their activities. Companies are becoming aware of the need for socially responsible conduct, accountability and transparency. It is precisely the nexus between recordkeeping and corporate transparency that is the theme of this PhD study undertaken by the author at Monash University, School of Information Technology.

This research shows the relevance of recordkeeping for corporate transparency, in particular for the disclosure of information on multinational companies' activities and decisions impacting society and the environment. The researcher began with a survey of corporate websites to identify public statements of corporate transparency strategies and practices. The research proceeded with a case study of the sustainability process by interviewing three relevant groups:

story snapshot

This article explores the role of recordkeeping in corporate social responsibility and questions whether records – as evidence of business activities and decisions – contribute to sustainability reporting.

1 Regulators ie, organisations that establish sustainability reporting guidelines

2 Consultants ie, firms that help companies prepare the reports

3 Auditors ie, professional auditing associations who conduct and establish rules for external assurance reviews of the reports[3].

Subsequently, the author interviewed corporate records managers to gain an understanding of recordkeeping within a multinational company and to explore records managers' perspectives on corporate transparency and sustainability reporting. The author continued with a literary warrant analysis of the sustainability reporting standards[4] to identify recordkeeping requirements.

The author is currently comparing the research findings with existing recordkeeping standards in order to determine whether they meet the recordkeeping needs for sustainability reporting. Additionally, the author is in the process of specifying which elements of the recordkeeping framework are of most relevance to sustainability reporting as well as identifying the gaps that may need to be addressed to better meet business needs. This paper presents an overview of the research findings to date.

Analyses of corporate websites show that sustainability reports are largely used to communicate a company's social and environmental performance to the public as well as form an essential element of a company's corporate transparency activities.

Out of the 50 companies under study, 49 published sustainability reports. All 49 companies posted complementary information on the corporate responsibility or sustainability sections of their public website. Most reports contained quantitative and qualitative reporting on environmental and social information. Some companies acknowledged issues concerning the reliability of sustainability information: Statements or disclaimers included in the report on the website stated that social and environmental information (also referenced as 'non-financial data') could never have the same level of accuracy as financial data, and that, therefore, additional measures were required to verify the accuracy of this data.

These companies recognised the need for more internal control measurements to improve the accuracy and reliability of the information used for reporting. For example, Shell included the following statement in its 2006 report: *"We recognize that social data obtained from an internal survey of senior Shell representatives in each country has a significantly lower degree of accuracy than data from our financial systems So we carried out additional checks on these figures for 2006, to provide us with more confidence in their reliability"*[5].

These website reviews showed the importance of external assurance or audit in sustainability reports. Some companies use these external assurance providers to ensure the credibility, completeness and relevance of their reports on performance.

In its 2006 report on external assurance, Vodafone included the following statement *"being complete, transparent and meaningful can only be achieved if reported data is traceable and supported by evidence. Any initial gain in reputation will be easily lost if there is no credible measurement of performance"*. However, a website analysis conducted in 2007 (with a follow up in 2010) showed that assurance reviews focused on verifying the reporting process rather than the performance data.

SOME OF THE CHALLENGES

Only 30% of the companies under study looked at specific data such as data on emissions or employment records. The surveys also highlighted the challenges concerning the collection and publication of social and environmental performance data. The studies indicated that some of these cha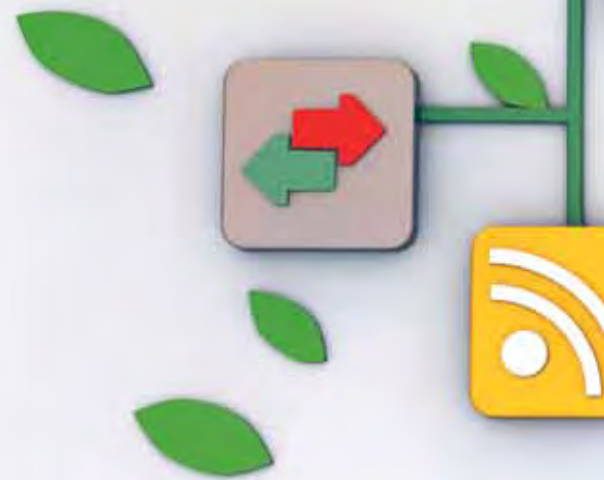llenges are linked to the significance of the volume and meaning of corporate information relevant for sustainability reporting which is created and maintained at the operational site level or subsidiary level of multinational companies[6].

External assurance provider Deloitte included the following statement in its auditor's report of France Telecom's sustainability report for 2007: *"Regarding the environmental indicators reported by the United Kingdom and by Jordan, our testing noted potentially significant anomalies regarding the reporting scope and the availability of evidence supporting the underlying data, which prevent us from concluding on the indicators reported by these countries"*[7].

The case study also found significant challenges involved in the collection process of sustainability performance information from subsidiaries. It demonstrated the complexity of reporting within multinational companies, particularly the challenges faced in the relation between the global headquarters and the subsidiaries around the world.

The case study equally showed the complexities of reporting on social and environmental performance for multinational companies. According to interviewees, work processes in multinational companies are not only complex because of the multitude of steps and actions taken across different business units, but also because they involve many different actors and locations. Interviewees said that there was insufficient knowledge within multinational companies about the global operations their company undertakes and a small understanding of what was going on within the different locations worldwide. According to interviewees, in particular consultants and auditors, the global scope of reporting challenges data gathering and subsequent analysis from subsidiaries. They indicated that there were different working procedures, interpretation of the definitions, procedures and cultural differences between the subsidiaries. These variations could lead to a different understanding about which information to collect and where to retrieve it.

Interviewees mentioned that those preparing the report experienced difficulties when formalising inputs from different locations into a consolidated report. They pointed out that the quality of the information that comes in at corporate headquarters depends on the quality of the corporate guidelines. One interviewee added that unless guidelines are thoroughly detailed, then subsidiary employees will be

Furthermore, consultants pointed out that this risk was not only the results of lose internal guidelines and instructions but that it was also important to verify compliance with these corporate reporting guidelines, especially when a conflict occurs between corporate and local regulations on reporting. For example, when the corporate guidelines differed from what the subsidiaries had to report to the authorities in their own country.

According to one interviewee, *"most companies have some sort of corporate reporting guidelines internally. This sets down the definitions that we, as auditors, are supposed to use. The question is compliance with corporate reporting guidelines, especially when there is conflict between corporate and local legislation and regulations on reporting…This can be a real problem for recordkeeping and evidence; most locations are not very happy when the corporate guidelines differ from what they have to report to the authorities in their own country. The quality that comes in at head office depends on the quality of the corporate guidelines; if these guidelines are not detailed enough then people do their own thing – the local office will interpret them as they want to"*.

The case study sought to gain an understanding of the role of documentary evidence in sustainability reporting, as well as the challenges and issues related to it. Some of the challenges identified included access and/or availability of evidence, accuracy, reliability, and management of the performance data. Interviewees were also asked to identify sources of documentary evidence. The table over page specifies the most commonly used sources.

tempted to do their own thing and local offices will interpret them as they see fit. The interviewees therefore emphasised the need for more control and oversight of the data collection process by the office that prepares the report. Overall, there is a high risk of obtaining inconsistent and erroneous data sets which are particularly difficult to verify and consolidate in one report. In this light, one interviewee mentioned that: *"Talking to people who do this stuff, you get all the war stories. Each different factory or sub-location often has a different way of collecting, recording, analysing, identifying and categorizing source information."*

SOURCES OF DOCUMENTARY EVIDENCE (IN ALPHABETICAL ORDER)	EXAMPLES
Information systems	Financial, human resources, supply systems
Internal correspondence	Letters, memoranda, emails
Invoices (internal and external)	For example energy bills, hospital bills, waste disposal bills, fines sent from national or international authorities
Logbooks	Registers of incoming and outgoing goods activities, time records
External correspondence	Letters from national or international authorities and third parties
Media	Media reports, articles, stakeholder reports and publications
Policies	Corporate governance policy, Code of Ethics, Code of Conduct, Human Resources policies, but also policies from the host country

The interviews showed that the role of evidence is most significant during the collection and assurance review phase of sustainability reporting. One of the auditors provided the following example on how evidence is used during the assurance review: *"Well again it is still debatable but generally for our multinational clients, we visit a selection of sites and at site level we will look at underlying evidence of site records. So we go back to the actual bills such as electricity or energy bills or a sample of records of a weighbridge for waste leaving the site. It is more to show whether the actual systems are working or not. So we go to the weight bridge person and say when a lorry comes in and goes out on the weight bridge ask how a form is filled out and how these records are then transferred and added up to the month or the year. So you are looking at a sample of records from source up to the numbers that they then report to corporate."*

The study showed that information management in the reporting process can facilitate the retrieval of information to improve the data collection and recording process, and ultimately enhance the reliability, accuracy and completeness of reported information. Furthermore, the case study clearly demonstrated the need for robust information management systems to manage the collection of data from offices around the world. Interviewees stressed the opportunity for information management and the need to implement it now.

Since records are evidence of corporate activities and decisions, recordkeeping principles and programs should, logically, be a critical element in sustainability reporting activities. How do the companies leverage corporate recordkeeping programs to support sustainability reporting?

How is the records profession involved in these activities? Case-study interviewees were asked about their thoughts on the role of recordkeeping in sustainability reporting, in particular how recordkeeping would, in their opinion, contribute to reporting. Their replies showed that the interviewees had, at first, little knowledge of recordkeeping and the profession of records manager and consequently had difficulties seeing the nexus with sustainability reporting. One interviewee asked: *"What is the person called, what is their title? A lot of companies would not have such a person, is that correct?"* Once informed about the nature of recordkeeping, interviewees recognised the crucial importance of recordkeeping particularly with regard to overcoming some of the challenges related to sustainability information discussed above. Interviewees indicated that if the information that goes into a system were well organised, accessible, accurate and reliable, the output of the system and the reports would most likely follow suit.

ASSESSING RECORDKEEPING INVOLVEMENT

The interviews with corporate records managers addressed the involvement of recordkeeping programs and corporate records managers in sustainability reporting. The interviews were conducted in 2009 and follow up questions were sent in 2011. The research analysed the drives for a corporate recordkeeping program. The interviews suggested that companies establish corporate records management programs primarily to support internal objectives, such as cost containment by eliminating redundant and facilitating business and decision-making throughout the company by ensuring that information is easily retrievable. The drives most commonly referenced by the interviewees were: business efficiency; regulatory compliance; litigation; risk mitigation and business support. None of the respondents cited sustainability or transparency as triggers to establish a corporate records program.

The answers to the questions addressing sustainability reporting were short. One respondent simply said this did not fall under the responsibility of the corporate records management office and would have to be addressed by the responsible group within the company. Another one replied that because of the immaturity of the sustainability program, the records department was not yet involved. Yet another interviewee indicated that the responsible business group ran its own sustainability program and was responsible for the any disclosure activity with regard to health, safety and disclosure. As can be interpreted from these replies the corporate records program is not on the forefront when it comes to sustainability. The analysis of the interview responses gave the following explanation for this situation:

◆ Sustainability is an emerging issue for the company and procedures are not yet incorporated into the corporate programs or are still being defined.

ABOUT THE AUTHOR
Ineke Deserno is a PhD candidate at Monash University. She lives and works in Belgium. Since February 2010 she is the North Atlantic Treaty Organization (NATO) Archivist. Ineke has over 18 years of professional experience in international organizations, including UNHCR, IOC and WHO. Ineke holds a masters of the Radboud University in the Netherlands, followed by post-graduate education at the School for Archival Studies in the Netherlands. She completed a post-graduate certificate in archives and records management at the University of British Columbia in Canada. She is an active member of the ICA and ARMA International.

> *Transparency is identified as a risk and therefore companies take a very cautious approach to disclosing records*

◆ Sustainability is carried out by the responsible business units and this includes providing access to business records that document the company social and environmental performance.

◆ Records required as input for a sustainability report are collected by subsidiaries or local business owners, the global records program does not need to be involved.

◆ Transparency is identified as a risk and therefore companies take a very cautious approach to disclosing records.

From the responses given to the questions it became apparent that there is uncertainty among the interviewees whether corporate records should be involved in sustainability reporting. Some respondents clearly felt that this was the responsibility of the business units or subsidiaries as the owners of the records and needed no involvement from corporate records. When asked about the records documenting the company's social and environmental performance one respondent indicated that these records are created and managed by the responsible business units or subsidiary. This respondent however saw a need to address the retention of the final version of the corporate sustainability report which is comprised of the different local inputs.

There seems to be a common understanding among all interviewees that the management of the sustainability related records happens at the local or business unit level and that this is the responsibility of this business unit or subsidiary. However not all agreed on the level to which the corporate records program needs to be involved.

Another respondent indicated that the corporate records program will need to provide guidance on the management and retention of these records and already indicated the likelihood that the corporate records office would provide guidance to business units and offices creating records that are relevant for sustainability reporting. Other respondents also indicated the need to cover these records in the global retention program.

IN CONCLUSION

Concluding one can say that currently corporate records programs are not involved in sustainability matters throughout the company. Some questioned if they had to be at all involved in this, but about half of the respondents saw a role for the corporate records office in providing retention guidance. Disclosure, however, was felt by the large majority of the respondents to be a matter for the responsible business unit or subsidiary and not an issue for corporate records.

The interviews with corporate records managers showed an uncertainty about the nexus between a corporate records program and sustainability reporting. The next step in the research was then to do a critical analysis of the sustainability reporting framework consisting of sustainability reporting but also external assurance standards or warrants to identify requirements concerning evidence and information[8]. Each warrant was reviewed for statements that outline the requirements for the management of information, evidence and/or sources related to reporting and auditing. These requirements were then collected and organised into the three following information categories: information quality[9]; information management; and, information systems. The table below provides an example of an information quality requirement[10], the highlighted text shows key statements that will contribute to forming the recordkeeping requirements.

Although all warrants clearly showed requirements that have recordkeeping implications, none of these warrants explicitly referenced recordkeeping as a necessary professional activity nor was a recordkeeping standard cited in one of the standards. This indicates that there is little awareness within the reporting and assurance providers' professional community about the recordkeeping profession and the recordkeeping standards. This finding was also confirmed in the sustainability case study. Although the reporting framework analysis clearly showed the nexus between sustainability reporting and recordkeeping, at this point in time, there is no connection with the professional recordkeeping community.

INFORMATION QUALITY	
REQUIREMENT	**MEANING**
Accuracy	Content of the report needs to be factually correct and sufficient in detail for stakeholders to assess the reporting organisation's performance. This implies that **the report is based on and thus has access to information that is without errors,** and gives a faithful representation of the business activity or decision to which it relates. Furthermore the content of the report is derived from information which is relevant to a company's performance and the information addresses all significant activities and impacts related to social responsibility. Source documents can serve as evidence of a statement in the report or assist in the verification of the content of the report. Source documents are accurate. It should be possible to identify and access the source document. The performance information and/or source document should relate to a decision or activity directly relevant to the statement in the report.

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Directory

Chair
David Pryde MRIM
Email davidhp@xtra.co.nz

CEO
Kate Walker FRIM
Email kate.walker@rimpa.com.au
Mobile 0409 250 795

**Membership & Customer
Services Manager**
Maree Cooper
Email maree.cooper@rimpa.com.au

Finance Officer
David Webb
Email david.webb@rimpa.com.au

Marketing & Convention Officer
Kristen Keley MRIM
Email kristen.keley@rimpa.com.au

**Branch Manager, & Sales
& Sponsorship Coodinator**
Wendy Morris
Email wendy.morris@rimpa.com.au

Address for all:
PO Box 276
St Helens TAS 7216

The research is currently looking into the recordkeeping framework and how this framework responds to business needs. While still in progress, this paper has, nonetheless, already included some preliminary findings. Largely due to the success of the first international standard on records management, ISO 15489, and subsequent recognition and implementation of the Standard by public and private organisations around the world, the past ten years have seen a notable increase in international standard developments and initiatives within the recordkeeping community. This has resulted in a number of new ISO standards, such as the ISO 23081, ISO 16175 and ISO 30300. These provide a solid framework but are still isolated and largely unknown to other professional groups despite an attempt being made with the ISO 30300 standards to remedy this[11], The route of ISO 30300 seems to be an appropriate approach to connecting the business community. However, in order to effectively reach out to a business and to ensure a profound impact of its professional principles, the records community should seek to integrate recordkeeping requirements directly into business standards, for example the ISO 26000 Guidance on Social Responsibility and the ISAE 3000 International Standard on Assurance Engagements of the International Federation of Accountants (IFAC).

This will not only raise awareness among the business community but also introduce essential elements into business standards which will contribute, in the case of sustainability reporting, to more reliable and credible reports. Considering the high uptake of these business standards, there is a real possibility of effectively reaching out to businesses.

Records and recordkeeping principles will reach out to a larger community and give the records profession the opportunity to raise awareness of its other standards of relevance to the business community. Records professionals should now use this opportunity to connect with relevant business communities and make the recordkeeping requirements a core component of the business process.

At the same time, records professionals and in particular those working in a business environment should follow the way organisations do business and identify areas that require recordkeeping principles and requirements. This will mean a shift away from the operational day-to-day work and will involve a pro-active outreach to business units. It will also enable risk analysis to identify those areas that present the highest risk when information management or evidence needs are not addressed appropriately. As the regulators, auditors and consultants already indicated in their interviews, it is now time to implement effective recordkeeping for corporate social responsibility. ❖

Bibliography

1   Sustainability reports are also known as corporate social responsibility reports and ESG reports. For ease of reading, the remainder of the paper will use the term 'sustainability report' to refer to multinational companies' reports on the impact of corporate past and present decisions and activities on society and the environment.

2   'Just good business. A special report on corporate social responsibility'. *The Economist*, volume 386, number 8563 (January 2008) and Henriques, A., (2007). *Corporate truth. The limits to transparency*, London: Earthscan, p.78.

3   For confidentiality purposes, the names of individuals and organisations will remain anonymous when writing up the findings of the case study.

4   Reporting standards are also known as the review of the reporting framework.

5   http://reports.shell.com/sustainability-report/2011/servicepages/previous/files/shell_sustain_report_2006.pdf

6   For example information related to local labour practices and procedures, records on CO2 submissions of plants and/or waste management.

7   http://www.orange.com/en/responsibility/documentation/documentation

8   The literary warrants determine professional practices for reporting and auditing, and their authority was confirmed in the survey of the public websites of multinational companies and case study. These included among others: ISO 26000 Guidance on social responsibility; G3.1 Global Reporting Initiative Sustainability Reporting Guidelines; AA1000 Accountability Principles Standard (APS); and, International Standard on Assurance Engagements of the International Federation of Accountants (IFAC).

9   Quality of information, evidence, sources and/or the report itself.

10 This table is for information purposes only, the complete list of requirements is available in the thesis of the PhD research and forthcoming publications.

11 The intention of the ISO 30300 initiative is to establish a Management System for Records (MSR) and in alignment with recognised ISO management methodologies known as the "Management System Standards (MSS)". The standard is intended for people who make the decisions in an organisation around the establishment of the MSR and who allocate resources.

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