

MANAGEMENT ACTION PLAN - Audit of Departmental Compliance to the MGIH Policy

Deficiencies identified by auditor	Recommendation	Response/Action	Time-frame	Actioning Office
1. <i>Electronic information is not under the control of lifecycle management. Pg. 5</i>	1.1 Convenience records should be assigned a retention period (pg. 5)	Agreed. A retention period will be defined in the policy.	Mar 03	AS
	1.2 Policy on the use of convenience records for business decisions should be issued especially in areas where paper records are the official corporate copies, and where electronic copies are the convenience copies (pg. 5)	Agreed. Convenience records will be defined in the revised records management policy.	Mar 03	AS
2. <i>Electronic records are not under the control of a classification system.</i> <i>The current classification system may not be valid for electronic record holdings (pg. 6)</i>	2.1 An analysis should be undertaken to identify and implement what is the best schema, what is the most acceptable method of classifying electronic records for identification and for application of disposition policies. (pg. 7)	Agreed. An analysis will be conducted on the use of the existing schema for electronic records during the pilot phase for the system which the Department will potentially use (e.g. RDIMS).	Mar 03	AS
3. <i>Lack of efficiency through reliance on a paper based system as the official record medium. (pg. 8)</i>	3.1 Analysis should be conducted to identify what types of records could be retained in an electronic system as Official Records. (pg. 8)	Agreed. The use of a system to manage electronic records will be explored.	Mar 03	AS

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<i>4. Limiting Record Office hours suggest that staff keep records, or copies of records, at their desk so they can have unlimited access to frequently used records (pg. 8)</i>	4.1 Convenience records should be assigned a retention period; (pg. 9)	See rec 1.1	N/A	AS
	4.2 Policy on the use of convenience records for business decisions should be issued especially in areas where paper records are the official corporate copies, and where electronic copies are the convenience copies. (pg. 9)	See rec 1.2	N/A	AS
<i>5. Possibility that not all archival records are printed and passed for control to records management. (pg. 9)</i>	5.1 The Department must have a policy and standard operating procedures for the identification and storage of all records documenting the evolution of an official record as defined under the Transitory Records Authority issued by the NA; (pg. 9)	Agreed. Policies and standards will be developed.	Mar 03	AS
	5.2 The Department must ensure that records documenting the evolution of official records are available for an archival appraisal; (pg. 9)	Agreed. This will be addressed in the policy to be developed as per 5.1	Mar 03	AS

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	5.3 Archival records must be transferable to NA upon the expiration of the retention period assigned to the records by the Department. (pg. 9)	Agreed. This will be addressed in the policy to be developed as per 5.1	Mar 03	AS
6. <i>“Employee Security and Safety Instructions” ask staff to clean systems of old files. However, under the National Archives of Canada Act, no record can be destroyed without the consent of the National Archivist of Canada. To receive consent for the destruction of electronic records, NA must approve the methodology of preserving records as official copy in another medium (pg. 9)</i>	6.1 Consolidation of all directives for an e-mail policy should be made available in one, clear, concise document, easily accessible at the desktop; (pg. 10)	Agreed. E-mail policy to be developed.	Mar 03	AS
	6.2 Standard Operating Procedures for identifying Corporate Records at the desktop, and directions for Corporate retention, including migration of records from one medium to another, should be developed and made available to all staff for quick reference; (pg. 10)	Agreed. Procedures for corporate records to be developed.	Mar 03	AS

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	<p>6.3 Documentation on records migration from one medium to another must comply with the guidelines outlined in Part IV of the Canadian Standards Board's Microfilm and Electronic Images as Documentary Evidence (Can/CGSB-72.11-93). (Part IV of the Standard is a summary of international standards applicable to the management and documentation of all systems used to hold or manage official legal records, regardless of media. (pg. 10)</p>	<p>Agreed. This will be addressed in the procedures to be developed as per 6.2.</p>	Mar 03	AS
<p><i>7. The Department intends to scan paper records and offer them electronically to staff in the near future. However, no plans, showing how the Department is preparing for meeting the legal and archival scanning requirements under the Multi-Institutional Disposition Authority (MIDA), were provided for this Audit. (PG. 10)</i></p>	<p>7.1 The Department should examine closely the requirements under MIDA, and specifically, requirements under the Records Disposition Authority No. 96/023 which relates to Electronic Imaging Systems. (PG. 10)</p>	<p>Agreed. There is no intention of using the scanned record as the official record. The image will only be used as a reference copy. The hard copy will be retained as the official record. This recommendation is therefore not applicable.</p>	Complete	AS

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8. <i>There is a total under-use of Transitory Records Authority (PG. 10)</i>	8.1 Training for records management staff on Transitory Records is recommended; (PG 10)	Agreed. Training will be arranged.	Mar 03	AS
	8.2 Departmental policy on the destruction of Transitory Records should be incorporated into all other policies dealing with the management of records, i.e. e-mail policy; (PG 10)	Agreed. Policy on destruction of transitory records to be developed.	Mar 03	AS
	8.3 A methodology for identifying Transitory Records in the Department should be developed; (PG. 11)	Agreed. A procedure will be developed.	Mar 03	AS
	8.4 Examples of Transitory Records should be developed for distribution to staff as examples and as teaching tools for in-house training for new staff; (PG 11)	Agreed. To be developed as per 8.3	Mar 03	AS

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	<p>8.5 Help from NA or qualified consultants should be sought to review any training material, desktop documentation, to ensure that the concepts of Transitory Records are clearly outlined before random destruction of work files takes place (PG 11)</p>	<p>NA will be consulted to determine what assistance they can provide.</p>	<p>Mar 03</p>	<p>AS</p>
<p>9. Most responses under the Acts are not meeting the 30 day turnaround time requirement. Extensions are necessary of between 30 to 120 days. (PG 11)</p>	<p>9.1 The Department should consider conducting a review to identify all causes for the difficulties in meeting the 30 day-turnaround time for processing ATIP requests and prepare an action plan to deal with the difficulties. (PG11)</p> <p>Note: Implementation of recommendations for better management of records expressed in this Audit Report should help shorten the time used to search for records.</p>	<p>Completed. Although the <u>Access to Information Act</u> establishes a 30-day response time for providing records, it also provides for extensions to be applied when warranted. The problem therefore is not in meeting the 30-day time limit and thereby seeking extensions, the problem is that there are times when even with extensions, the deadline is not met.</p> <p>The causes for late requests (complexity and scope of requests, need for consultations with multiple stakeholders, etc.) have already been identified. Ameliorative action has been taken, including: ATIP awareness and training has been provided; deadline tracking and weekly deadline alerts have been improved; additional ATIP analyst has been engaged; new technologies are being utilized to improve efficiencies;</p>	<p>Completed</p>	<p>ATIP</p>

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		<p>and, recommendations for legislative change to streamline ATIP administration have been made to the federal ATIP Task Force.</p> <p>It must therefore be concluded that while changes to the information management practices elsewhere in the Department will have a positive effect on ATIP processing, other causes for late responses to ATIP requests have been identified and action has been taken to deal with the issue of late requests. Effective management of the ATIP process demands constant vigilance and review and there is ongoing dialogue within the ATIP community across government in order to exchange information on best practices and latest technological advancements.</p>		
<p>10. <i>Access to Information requests are difficult to apply to records at the desktop.</i> (PG12)</p>	<p>10.1 Note: Implementation of recommended information management policies and standard operating procedures outlined in this Audit Report should help to minimize the risks outlined here (PG12)</p>	<p>No response required.</p>	<p>N/A</p>	

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<p><i>11. The Department does not follow any IM standards or best practices models to ensure that work process are documented to established evidence of how the organization creates records, maintains system administration security (documentation of work processes of how the Department creates user groups), and how the Department accounts for audit trails, who had access to what record and when, what is the normal business process for using records (PG 13)</i></p>	<p>11.1 The Department should consider a development of a plan to implement documentation of systems, work processes, policies and standard operating procedures to protect the organization should its business practices be subjected to criticism, accusations in the media or challenged in the court of law; (PG 13)</p>	<p>The development of a plan will be considered once the system for managing electronic records of the Department has been identified. A decision will be made at that time regarding the need to document.</p>	<p>Mar 03</p>	<p>CMB</p>

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	<p>11.2 Records Management personnel should be given opportunities to attend conferences such as the Association of Records Managers and Administrators (ARMA) and/or Association of Image and Information Management International (AIIM) and other information management conferences as part of their training and development; (PG 14)</p>	<p>This has always been the case.</p>	<p>Complete</p>	<p>AS, CMB</p>
	<p>11.3 The Department should invest in a corporate membership in organizations such as ARMA or AIIM to receive excellent material on legal requirements and best practices in records management; (PG 14)</p>	<p>The Department has a corporate membership in ARMA. A membership in AIIM will be investigated.</p>	<p>Mar 03</p>	<p>CMB</p>
	<p>11.4 The Department should consider obtaining or purchasing current standards on IM, such as the new Records Management standard from ISO and content management documentation from such organizations as Doculabs (PG 14)</p>	<p>The Department has a copy of the draft Records Management Standards and will obtain a final version. Documentation on content management will be purchased from Doculabs for reference for the records management staff.</p>	<p>Mar 03</p>	<p>AS</p>

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<i>Deficiencies identified by auditor</i>	Recommendation	Response/Action	Time-frame	Actioning Office
	<p>11.5 The Department should consider seeking help from National Archives of Canada or hire qualified consultants to train staff in documenting Departmental work processes and systems according to the general guidelines outlined in Part IV of the Canadian Standards Board's Microfilm and Electronic Images as Documentary Evidence (Can/CGSB-72.11-93). (PG 14)</p>	<p>To be explored with National Archives.</p>	<p>Mar 03</p>	<p>AS</p>
<p>12. <i>Screen captures of the Web Pages are not maintained to ensure that there is a record of the type of information that was made available to the public and when it was available; (PG 14)</i></p>	<p>12.1 "Screen captures" of the Departmental Web Pages, with date stamps, is highly recommended. (To have proof what was on the Web at any time) (PG14)</p>	<p>Agreed. To be implemented as part of the new redesigned version of the Department's Internet site.</p>	<p>Sept. 2002</p>	<p>SYSTEMS</p>

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<p>13. Paper records created in a mixed media environment are often orphaned records. Orphaned records are records which are not linked to relevant information in other records of the same medium or records in other media, and which are not presented in context of their creation. (pg 14)</p>	<p>13.1 A classification system for all media records should be developed (pg 15)</p>	<p>The Department does have a classification system which could be used for all media. As per recommendation 2.1, an analysis will be conducted to determine its suitability for all media.</p>	<p>Mar 03</p>	<p>AS</p>
	<p>13.2 Staff should be made aware of the consequences of allowing the existence of "orphaned" records. (pg 15)</p>	<p>Training will be conducted.</p>	<p>Mar 03</p>	<p>AS</p>
<p>14. There is no evidence that a formal functional requirements study has been conducted to establish what type of technology would best serve the business of the Department (PG 17)</p>	<p>14.1 Integrated Justice has hired a consultant to do a study of the best methods of organizing information and search and retrieval. Findings of that research should be used to evaluate the functional requirements identified and testing these against the current system; (PG 17)</p>	<p>Agreed. The findings from the study by IJI will be combined with the findings of this audit to prepare functional requirements for an integrated records and document management system for all media sources.</p>	<p>March. 2003</p>	<p>AS & SYSTEMS</p>

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	14.2 Should the current system not meet the required functional requirements, evaluation of other options, including the recently revised RDIMS package backed by Treasury Board Secretariat, should be undertaken by the Department. (PG 17)	Agreed. A review of options for an integrated records and document management system for all media sources will be carried out.	March. 2003	AS & SYSTEMS
15. <i>Lack of a comprehensive e-mail Policy. (Current documentation, referencing the use of e-mail and direction for printing of records, needs to be either expanded, or a new stand-alone e-mail policy should be issued);(PG 18)</i>	15.1 E-mail directives need to be consolidated into one document; (PG 18)	As per 6.1.	N/A	AS
	15.2 The e-mail directive needs to be more comprehensive and written in a clear concise style (PG 18);	As per 6.1.	N/A	AS
	15.3 Standard operating procedures for handling e-mail for capture as Corporate Record, keeping as convenience copy or disposal need to be provided to staff and made available at the desk top. (PG 18)	As per 6.1, 4.2, 5.1, 6.2, 8.3 & 8.4	N/A	AS

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16. <i>Lack of classification system that would be easy for users to use at the desktop; (PG 19)</i>	16.1 An analysis needs to be conducted to identify what type of classification system is effective and can be implemented with the least possible resistance from staff that will need to apply it to electronic records (PG 19)	See 2.1.	N/A	AS
17. <i>Excessive records on the system clog up the servers. There are also issues with finding the right information when too much information exists. Security controls, and application of ATIP is also difficult to apply in systems that are over flowing with surplus information (PG 19)</i>	17.1 Records management staff must learn the legal concept of Transitory Records; (PG 19)	See 8.1.	N/A	AS
	17.2 Policies and standard operating procedures related to Transitory Records must be written and made available to staff; (PG 19)	See 8.2, 8.3, 8.4	N/A	AS
	17.3 Examples of Departmental Transitory Records should be made available as illustrative help (PG 19)	See 8.4.	N/A	AS

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18. <i>Official publications, including publications to the Web, must be deposited with the National Library, regardless of their media or if they were published on the Web. This could become an issue once publishing to the Web increases. Transfer of electronic records to the National Library has not begun. (PG 20)</i>	18.1 A policy for managing content on Web Pages needs to be developed. (PG 20)	Agreed. To be implemented as part of the new redesigned version of the Department's Internet site. Note: In December 2001, the Department entered into an arrangement with National Library for the routine transfer of its electronic publications. Implementation of the agreement has been delayed to accommodate the requirement to include metadata in the record. Departmental staff are currently working on a metadata policy, and will develop a standard procedure and indexing vocabulary.	Dec. 2002	CMB & COMM
	18.2 Terminology used for records and published material needs to be standardized. (PG 20)	Agreed. To be implemented as part of the new redesigned version of the Department's Internet site.	Dec. 2002	CMB & COMM
19. <i>Better Management of Departmental Web Page (PG 21)</i>	19.1 Lifecycle management needs introduction (PG 22)	Agreed. To be implemented as part of the new redesigned version of the Department's Internet site.	Dec. 2002	CMB & COMM
	19.2 Content management needs introduction (PG 22)	Agreed. To be implemented as part of the new redesigned version of the Department's Internet site.	Dec. 2002	CMB & COMM
	19.3 Screen captures, with time stamps of Web Pages should be considered (PG 22)	Agreed. To be implemented as part of the new redesigned version of the Department's Internet site.	Sept. 2002	CMB & COMM
	19.4 Policy to identify what records will be systematically placed on the Web. (PG 22)	Agreed. To be implemented as part of the new redesigned version of the Department's Internet site.	Dec. 2002	CMB SYSTEMS

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