



# Guideline

## Information Management Governance, Accountability and Organization

### Governance

Authority: Office of the Chief Information Officer

Applicability: Information Management professionals and other resources responsible for the implementation and operation of a records and information management system (also referred to as an Information Management Program) within a department or other public body, as defined in the Management of Information Act.

Compliance Level: Recommended

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This document is available in alternate format. Please contact [OCIO@gov.nl.ca](mailto:OCIO@gov.nl.ca).

Forward questions and/or comments related to this document to [IM@gov.nl.ca](mailto:IM@gov.nl.ca).

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## 1.0 Overview

An Information Management (IM) Governance Framework describes the actions supported by a department or other public body to meet IM legal, regulatory and operational requirements. This Guideline is designed to assist departments and other public bodies to develop an approach to IM Governance, Accountability and Organization.

IM Governance Components, Accountability and Organization are essential components of the IM Governance Framework.

**IM Governance Components** refer to the functions of planning, administration, program support, service delivery and practices by which a public body is directed, controlled and held to account and authority within a department or other public body.

**IM Accountability** in this context includes the identification of the departmental or other public body's roles and level of engagement required to ensure that the IM program operates effectively.

**IM Organization** refers to the way that these responsibilities are allocated to individuals in the department or other public body.

Guidelines are recommended actions, general approaches and operational behaviors. Guidelines are generally a description that clarifies what should be done and how to achieve the objectives set out in policies, directives and standards.

Guidelines issued by OCIO provide a recommended approach, as they take into consideration the varying nature of information management programs.

## 2.0 Purpose

The IM Governance, Accountability and Organization Guideline provides a recommended approach that will serve to drive the design, development, implementation and management of an effective IM Program. This Guideline is part of a broader GuideBook that supports the requirement set forth in the Management of Information Act (MOIA) for permanent heads of departments and other public bodies to implement a records and information management system.

### Expected Deliverable(s)

1. An approved and published IM Governance Framework document, made available to all members of the organization outlining the department or other public body's IM governance, accountability and organization.

The GuideBook, also known as the Guide to IM for Public Bodies, includes the following guidelines.



Graphic: 1 - GuideBook Contents

### 3.0 Definitions and Acronyms

A complete listing of terms are located on the OCIO website - Information Management and Protection (IM&P) Glossary of Terms.

**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. (Gartner, <https://www.gartner.com/it-glossary/>)

The table below includes common abbreviations used by OCIO as well as acronyms found within this document.

Abbreviation	Description
ATIPP	Access to Information and Protection of Privacy
EDRMS	Electronic Document and Records Management System
IM	Information Management
IM&P	Information Management & Protection
IMCAT	Information Management Capacity Assessment Tool
IMSAT	Information Management Self-Assessment Tool
IP	Information Protection
IT	Information Technology
MOIA	Management of Information Act
OCIO	Office of the Chief Information Officer
RRDS	Records Retention and Disposal Schedule

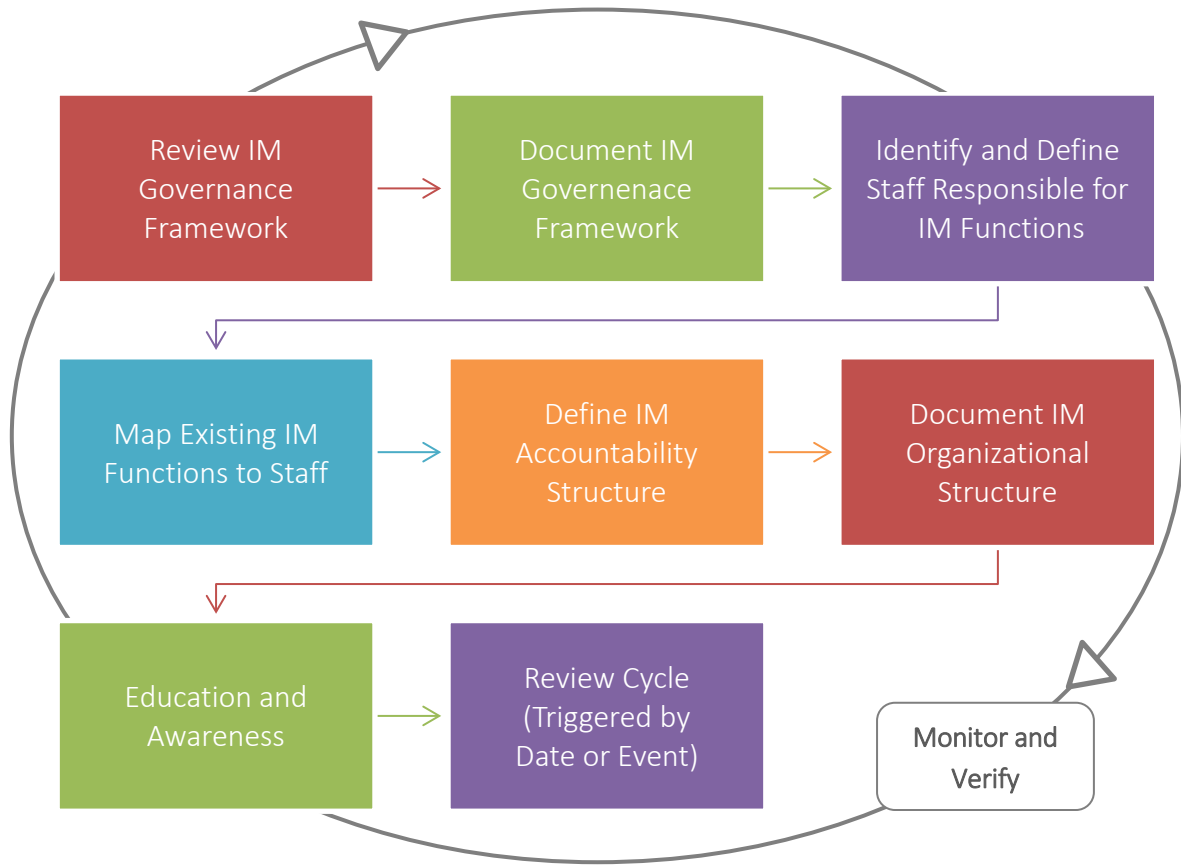
## 4.0 Recommended Approach

The intent of this Guideline is to provide recommended actions, general approaches and operational behaviors that when implemented will serve to drive the design, development, implementation and management of an effective IM Program through the development of an IM Governance Framework.

After reading this document, a department or other public body should be able to apply the knowledge and have an understanding of their own IM governance structure including how and by whom IM decisions are made and IM functions are carried out within in their organization.

Information Management Governance refers to the approach for the responsible and compliant management of information within an organization. It is important to note that there is also government-wide IM governance, accountability and organization, and a department or other public body should determine how they fit within the overall government model.

An example and government-wide IM governance would include the OCIO's responsibility for the MOIA. Although overall responsibility for creation and management of an IM Program generally rests with a department or other public body's division responsible for IM there are also specific accountabilities that fall to the OCIO. The OCIO, through the branches responsible for Information Management and Protection (IM&P), define and publish government-wide information management and protection policies, directives, standards, guidelines and other supporting materials. The IM&P branches of OCIO identify and update Information Management, Information Protection and Information Technology requirements and ensure appropriate distribution of communications across applicable departments and other public bodies.



Graphic: 2 - Recommended Approach

#### 4.1 Review IM Governance Framework

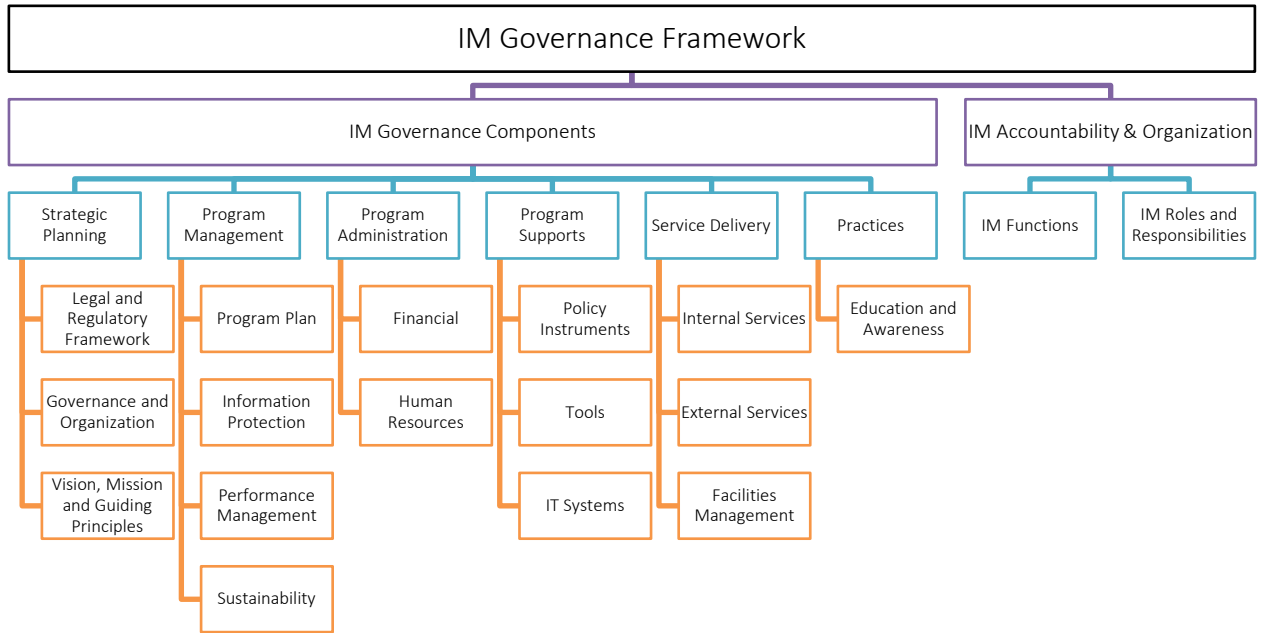
The IM Governance Framework is comprised of the defining, documenting and publishing of the governance, accountability and organization for information management within the department or other public body. The below graphic depicts the elements of an IM Governance Framework and is available as a separate document within the Appendices.

The below graphical representation of an IM Governance Framework groups related functions to promote an overall understanding of how they may be interrelated in a department or other public body.

The manner in which these functions are performed will vary depending on the size, scope and requirements of the department or other public body, available resources, etc. A single individual or group of individuals may be assigned to a particular function or to multiple



related functions as required to meet both the business requirements and the budgetary and organizational realities within which it operates.



Graphic: 3 - Pictorial Representation of an IM Governance Framework

#### 4.1.1 IM Governance Components

Outlined in the graphic below are common components of IM Governance and are further defined in the descriptions that follow. Note that within the Appendices there are a number of additional guidelines and supports to assist departments and other public bodies in understanding the various IM Governance Components.



Graphic: 4 - IM Governance Components

#### Strategic Planning

Driven by the department or other public body’s interpretation of how it will achieve compliance with its IM-related legal, regulatory and operational requirements. IM governance, accountability and organization described in this guideline provide a

foundation for strategic planning. Legal and regulatory requirements are non-negotiable considerations that must be incorporated into the department or other public body's IM strategy along with the vision, mission and guiding principles which state the foundation of what the IM program stands for and what it is designed to achieve.

### **Program Management**

Documents how IM capabilities and services are created, delivered and managed within the department or other public body. Key areas include the IM Program Plan (outlines how IM works in a department or other public body), Information Protection (outlines how information is protected through its lifecycle) and IM Performance Measurement (outlines activities to ensure that goals are consistently being met in an effective and efficient manner). This includes details regarding the development and implementation of performance benchmarks, metrics and reporting against the IM Program Plan.

### **Program Administration**

Refers to the activities required by the department or other public body to maintain operations within the framework adhered to by the organization as a whole. Financial management and human resource management are examples of these activities. Requirements including processes, approval and reporting requirements may be specific to the department or other public body or apply government-wide.

### **Program Supports**

Policy instruments, tools and systems used to support the operation of IM within the department or other public body. This includes the development of policy instruments (policies, directives, standards, guidelines and procedures) specific to IM-related activities as well as IM Tools used to document and prescribe technical requirements for the management of information. Also included are the Information Technology (IT) Systems used to house, manage and dispose of government information and support business and decision-making. Examples include Records Classification Plans, Records Retention and Disposal Schedules (RRDS) and Records and Information Inventories, Electronic Document and Records Management Systems (EDRMS) used to keep records and the IM Policy Instruments located on the OCIO website.

### **Service Delivery**

Includes the IM-related activities supported, both internally and externally, by IM staff identified in the organizational structure. This includes the internal and external services provided by IM within the department or other public body as well as the physical

structures used by the department or other public body to support ongoing operations including the creation, receipt, storage and disposal of government information.

**Practices** - include the way that employees support the department or other public body's IM Governance Framework. This includes both general employees and IM practitioners. IM education and awareness is used to ensure that employees have the information they need to meet their obligations, thereby improving overall IM capacity.

#### 4.1.2 IM Accountability and Organization

The MOIA prescribes a high-level accountability for IM. Each department or other public body must determine how this accountability will be assigned to ensure compliance with all IM-related requirements. IM accountability and organization identify how and by whom the above-described functions will operate within the department or other public body.



Graphic: 5 - IM Accountability and Organization Components

#### IM Functions and IM Roles and Responsibilities

Accountability includes the mapping of IM functions and level of engagement and IM responsibility to specific organizational roles. Based on these roles and responsibilities, an organizational structure (IM Organization Chart) including the employees within the organization's IM Program and their lines of reporting can be further documented and shared within the organization.

### 4.2 Document IM Governance Framework

The framework's IM governance components identified above should be used as a basis for the development of a departmental or other public body IM Governance Framework. Additional components may be required to accommodate organizational specific requirements (e.g., some departments may require specific elements to address certain lines of business or public bodies reporting to them).

An Information Management Capacity Assessment Tool (IMCAT) report, Information Management Self-Assessment Tool (IMSAT) report and other existing documentation such as business plans and annual reports may be key inputs to this activity.

Documenting each piece of the IM Governance Framework is important as it solidifies the structure and allows everyone in the organization to understand how IM operates within the department or other public body. It also helps to ensure a clear understanding of roles and responsibilities. Preparing a pictorial representation, like the one used above for the IM Governance Framework, with descriptions will help to identify gaps. Compare what the organization has with the above-identified categories. Add to the model any descriptions and department or other public body specific functions.

### **4.3 Identify and Define Staff Responsible for IM Functions**

In order to develop IM accountability and organization structures, it is important to have a solid understanding of the staff available to perform the IM functions. Using the IM Governance Framework identify the staff that currently perform functions. Note functions that do not have resources allocated.

Include in this assessment:

- The Executive responsible for IM within the department or other public body
- Existing IM Staff including their current position scope and job requirements
- Staff who perform IM functions but may not have IM as their primary role or share responsibilities (e.g., administrative support, policy analysts, etc.)
- Identify key resources on the periphery of IM practice within the organization that must be engaged in certain activities including:
  - Legal counsel responsible for advice and guidance on IM-related issues including legislative and regulatory requirements for records retention and disposal.
  - Access to Information and Protection of Privacy (ATIPP) Coordinator who must be engaged in the operation of the IM program to identify ATIPP requirements in the development of program components (e.g. retention schedules, procedures, policies, etc.) and support ongoing processes including records disposal. ATIPP Coordinators will also use IM services in the processing of requests made under the ATIPP legislation.

#### **4.4 Map Existing IM Functions to Staff**

Based on the model and descriptions identify the IM functions that are currently staffed. Examine the existing functions to determine whether staffing allocations are appropriate. Also, identify functions missing within the IM program to support the allocation of existing staff or new staff to address capacity concerns. Use the existing IM position descriptions and technical competencies located on the OCIO website to identify the skills and resources required to fill gaps.

#### **4.5 Define IM Accountability Structure**

The IM accountability structure identifies who is engaged in each IM function and at what level. This differs from the organizational structure because it identifies numerous resources engaged in operations other than IM (e.g., legal counsel).

- Deputy Minister/Executive
- Director of Information Management or Director responsible for IM
- Advisors to IM including Legal Counsel, and ATIPP Coordinator
- IM Professionals including managers, coordinators, analysts and technicians
- Functional Director/Manager(s)
- Administrative support
- Business Owners
- Employees

Roles and responsibilities link specific functions to employees. It is important to note that some IM functions are performed traditionally by staff in other business roles. This does not mean that they need to be reclassified as IM staff. For example, administrative staff supports the implementation of ERDMS solutions for Executive correspondence management because they are responsible for that function as a part of the Executive and management support role. The role of IM in the department or other public body is to support these staff by ensuring that the appropriate training and support is available to them related to the use of ERDMS solutions, scanning best practices, etc.

An IM Roles and Responsibilities - Template and Example has been included in Appendices. This tool assists in quickly identifying the roles responsible for each function and their level of engagement. Departments and other public bodies may find it useful to start with this type of listing and then develop the detailed roles and responsibilities descriptions.

## **4.6 Document IM Organizational Structure**

The organizational structure differs from the accountability model in that it identifies the way in which IM staff are organized within the department or other public body. Staff identified in the organizational structure have IM functions within their position description and are primarily responsible for IM functions.

### **4.6.1 Principles**

The following design principles are recommended in the development of the organizational structure:

**IM Reporting** - The Director responsible for IM will report to either the Deputy Minister or equivalent (e.g. CEO) or an Assistant Deputy Minister or equivalent (e.g. VP), who has overall accountability for IM under the MOIA. This supports the representation of IM as an essential corporate service at the Executive level.

**IM Professional Management** - All IM staff should report to an IM Director or an IM Manager who can provide specialized IM management oversight and supervision.

**IM Competency Model** - The IM organizational structure should use the IM Competency Model and its standardized IM position specifications adopted by Government.

**IM Resource Allocation** - The actual resourcing of the IM organization (numbers of IM staff members by position classification) will be dependent on the IM workload in the department or other public body and the availability of resources, but should at least aim to have an appropriate balance between management level and non-management operational IM staff resources.

### **4.6.2 Challenges and Opportunities**

A number of challenges, including those listed below, will affect the design of an IM organization for a department or other public body:

**Business Complexity** - A department or other public body with multiple lines of business and a large geographic spread will have more complex IM challenges than a smaller one with fewer lines of business and located in a small number of locations.

**Task Specialization** - Given that all of the IM functions identified in the organization's IM roles and responsibilities chart need to be done, the more staff that are included in the IM organization means that task specialization will be easier, with one individual usually possessing a high level of expertise and experience. In smaller IM organizations, multi-tasking will be required, with a broader range of expertise and experience required of each individual. In many cases, a multi-tasked resource cannot have the same level of expertise and experience as a specialized resource.

**Geographic Distribution** - Departments and other public bodies with offices and operations in more than one location face a greater IM supervisory challenge than those operating from one location.

**Staff Involvement in IM** - In actual practice, many non-IM staff perform IM functions, such as correspondence management. In these cases, the role for IM staff is to be a resource to assist the non-IM staff to perform IM functions. The IM staff can provide direction, assistance, advice and supervision of work as well as perform IM compliance checks.

**Management Structure** - The management structure in a particular department or other public body will affect whether the senior IM position is an IM Director/Manager or a Director/Manager responsible for IM, or a bargaining unit position.

**Support from OCIO** - OCIO branches responsible for IM&P offer many self-serve, specialized advisory/consultative services, and assistance for departments and other public bodies. A more detailed list can be found on the OCIO website or by contacting IM Advisory Services ([IM@gov.nl.ca](mailto:IM@gov.nl.ca)) and/or OCIO Information Protection ([OCIOInfoProtection@gov.nl.ca](mailto:OCIOInfoProtection@gov.nl.ca)).

### 4.6.3 Obtain Approval

The IM governance components and the accountability and organizational structures must be reviewed as appropriate by departmental or other public body stakeholders as per established organizational protocols. Communication to the organization at all relevant levels is essential.

## **4.7 Education and Awareness**

Education and awareness are essential for both employees and for those staff classified as IM professionals. All staff should be aware of the IM Governance Framework (governance, accountability and organizational structures). Departmental and other public body employees need to be aware of their role in IM and to understand the various services accessible to them and their responsibilities in managing information. It is essential that this information be communicated to all levels of staff. Ongoing education and awareness is also important for IM professionals, especially those who may have been newly allocated or reclassified to an IM role.

The below OCIO GuideBook guidelines provide detailed information on the development of strategies to support all staff.

- IM Education and Awareness for Employees
- Education and Awareness for IM Professionals

## **4.8 Review Cycle**

Review and update the IM Governance Framework (governance, accountability and organizational structures) to accommodate significant changes that affect departmental or other public body operations. At a minimum, schedule a formal review every two years or more frequently if required. Identify areas of the IM program that are not operating effectively and may require a modification in staffing allocation. Significant events that change the scope or nature of the department or other public body's business may also affect the governance and organizational structure.

Review and update may be required in the below situations:

- New legislation or new lines of business
- Reorganization of the department or other public body

## **4.9 Monitor and Verify**

A review and validation of Framework components and the inclusion of the IM Governance Framework into the orientation program for all necessary levels of staff are mechanisms for monitoring and verifying IM. The IM Governance Framework needs to be lifecycle managed to ensure it provides accurate and relevant information to the organization.



## 5.0 Roles and Responsibilities

### Departments and other public bodies

Under MOIA, departments and other public bodies must develop a records and information management system. The GuideBook and supporting materials assist a department or other public body in the development of a records and information management system, often referred to as an IM Program. Compliance with MOIA, OCIO's IM&P Policy approved by Treasury Board and subsequent policies, directives and standards that the OCIO develops is mandatory.

### Directors responsible for IM

In addition to promoting, the adoption of information governance through education and awareness, directors responsible for IM within a department or other public body should develop their own IM Governance Framework. This includes the need to draft, obtain executive approval, implement, communicate, publish and lifecycle manage an IM governance framework specific to the needs and requirements of their organization.

### Office of the Chief Information Officer

As part of OCIO's administration of the Management of Information Act, the OCIO

- Develops and manages IM&P policy instruments and supporting materials applicable to departments and other public bodies.
- Provides direction on IM&P best practices, resource requirements, organizational structure and IM systems
- Assists departments and other public bodies to improve their IM&P capacity
- Provides IM&P consultancy services and support to departments and other public bodies
- Supports the IM Directors Forum and the IM Community, consisting of IM representatives from departments and other public bodies
- Manages the Provincial Records Centre (PRC)
- Provides support to the Government Records Committee (GRC)
  - Review and revise schedules for the retention, disposal, destruction or transfer of government records
  - Make recommendations to the minister respecting government records to be forwarded to The Rooms Provincial Archives

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- Authorize disposal and destruction standards and guidelines for the lawful disposal and destruction of government records
- Make recommendations to the minister regarding the removal, disposal and destruction of government records

## 6.0 Supporting Materials and Version History

### Supporting Materials

Below is a listing of supporting materials hyperlinked to the published internet location.

*Management of Information Act*

<http://www.assembly.nl.ca/Legislation/sr/statutes/m01-01.htm>

Information Management and Protection Policy, TBM 2018-111 (replaces TBM 2009-335)

[https://www.ocio.gov.nl.ca/ocio/im/im\\_ip\\_policy.html](https://www.ocio.gov.nl.ca/ocio/im/im_ip_policy.html)

OCIO Website

<https://www.ocio.gov.nl.ca>

Information Management and Protection (IM&P) Glossary of Terms

<http://www.ocio.gov.nl.ca/ocio/im/glossary.html>

Guide to IM for Public Bodies

<https://www.ocio.gov.nl.ca/ocio/im/practitioners/chart.html>

### Version History

The following table highlights the version history of this document including date issued and version number.

Date (yyyy mm dd)	Version
2011 06 15	Version 1
2015 03 26	Version 2
2019 08 02	Version 3

## Appendices

A listing of policy instruments, support materials including templates and examples are available on the OCIO website to guide departments and other public bodies in the development of standard documents and content, supporting IM program development and management and the growth of IM capacity.

Appendices listed below directly relate to the GuideBook: IM Governance, Accountability and Organization and are published independent of this Guideline on the OCIO website, <https://www.ocio.gov.nl.ca/ocio/im/practitioners/chart.html>.

Appendix	Title
A	IM Vision, Mission and Guiding Principles Guideline – Checklist
B	Quick Reference – Records and Information Management System
C	IM Roles and Responsibilities – Template and Example
D	IM Governance Framework - Graphic

### Other GuideBook References:

IM Policy Instruments  
 Education and Awareness for IM Professionals  
 IM Education and Awareness for Employees  
 IM Legal and Regulatory Framework  
 IM Performance Measurement  
 IM Vision, Mission and Guiding Principles  
 Information Protection  
 Physical Records Storage Development and Use