Guideline

Information Management Policy Instruments

Governance

Authority:	Office of the Chief Information Officer

Audience: 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

Issuing Public Body: Office of the Chief Information Officer

                     Application and Information Management Services

                     Information Management Services

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Notice:

The Office of the Chief Information Officer (OCIO) is mindful of creating and delivering accessible materials, in line with the Government of Newfoundland and Labrador's Accessible Communications Policy. New materials created by OCIO align with policy requirements and modifications to existing materials will occur as part of the standard review cycle.

This document is available in alternate format. Please contact OCIO@gov.nl.ca.

Forward questions and/or comments related to this document to IM@gov.nl.ca.

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1.0   Overview

The Information Management (IM) Policy Instruments Guideline (hereafter referred to as the Guideline) is designed to assist departments and other public bodies in the Government of Newfoundland and Labrador to develop IM policy instruments and resultant framework that will serve to drive the design, development, implementation and management of an effective IM Program.

Developing IM policy instruments serve to strengthen a department or other public body's information management program and enable it to demonstrate compliance with legal, regulatory and operational requirements.

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 and are not compulsory, as they take into consideration the varying nature of information management programs.

2.0   Purpose

The IM Policy Instruments Guideline provides recommended actions, general approaches and operational behaviors to support the delivery of a managed inventory of IM policy instruments. This Guideline is part of a broader GuideBook that supports the requirement set forth in 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)

An IM Policy Instrument Framework

1. An IM Policy Instrument Listing that highlights existing policy instruments and identifies those that may require development.
2. An IM Policy Instrument Inventory that lists all current elements as well as governance and lifecycle management requirements.
3. Policy instrument template and process requirements outlined by the business owner within the organization; supplemented to meet IM controls as required.

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

1.0 Foundation
- 1.1 IM Governance, Accountability and Organization
- 1.2 IM Vision, Mission and Guiding Principles
- 1.3 IM Legal and Regulatory Framework
- 1.4 IM Program Plan

2.0 Components
- **2.1 IM Policy Instruments**
- 2.2 IM Performance Measurement
- 2.3 Service Continuity
- 2.4 Education and Awareness for IM Professionals
- 2.5 IM Education and Awareness for Employees
- 2.6 Physical Records Storage Development and Use
- 2.7 Information Protection

3.0 Tools
- 3.1 Records and Information Inventory
- 3.2 Classification Plan Development for Operational Records
- 3.3 Records Classification Plan Implementation
- 3.4 Disposal of Records
- 3.5 Record Imaging Services

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.

IM Policy Instruments - IM policy instruments include policies, directives, standards, guidelines and procedures that provide direction or guidance on the management and protection of information aligned with the principles set forth in the Information Management and Protection Policy. OCIO extends the definition to include policy instrument supports such as Webpages, FYIs, FAQs, Quick Reference or Re-Use Materials as items to include in an IM policy instrument inventory.

Policy - Policies are high level, strategic statements, authorized by Senior Executive that dictate what type of position the organization has taken on specific issues. Compliance is mandatory. Example: Information Management and Protection Policy

Directive - Directives provide an official authoritative instruction or order to the organization supporting an existing policy. Compliance is mandatory. Example: Instant Messaging Directive

Standard - Standards are requirements that dictate uniform ways of operating and provide tactical blueprints for implementation of policies and directives. Compliance is mandatory. Example: Corporate Records Information Management Standard (CRIMS)

Guideline - Guidelines are recommended actions, general approaches and operational behaviors that allows some discretion or leeway in its interpretation, implementation, or use. Compliance is not mandatory but recommended. Example: Email Guideline

Procedure - Procedures are a fixed, step-by-step task level sequence of activities or course of action (with start and end points) that must be followed in the same order to correctly perform a task. Compliance is mandatory but exceptions may occur. Example: Business Process/Forms, such as the New Account Request Form

Information Management and Protection (IM&P) Policy - The IM&P Policy approved by Treasury Board provides authority for the OCIO to establish mandatory Information Management and Protection directives and standards for the Government of Newfoundland and Labrador and its public bodies. The IM&P Policy establishes the overall framework for IM&P within the Government of Newfoundland and Labrador and its public

bodies in accordance with MOIA, ATIPPA, 2015, the Rooms Act and forms the basis for departments and other public bodies to develop their own supporting policy instruments aligned with the IM&P Principles.

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

Abbreviation	Description
ATIPPA, 2015	Access to Information and Protection of Privacy Act, 2015
CRIMS	Corporate Records Information Management Standard
IM	Information Management
IM&P	Information Management and Protection
IMCAT	Information Management Capacity Assessment Tool
IMSAT	Information Management Self-Assessment Tool
IP	Information Protection
MOIA	Management of Information Act
OCIO	Office of the Chief Information Officer

4.0   Recommended Approach

The intent of this Guideline is to provide recommended actions that when implemented support the IM Program's delivery of templated materials supported by an IM Policy Instrument Listing and managed through an IM Policy Instrument Inventory.
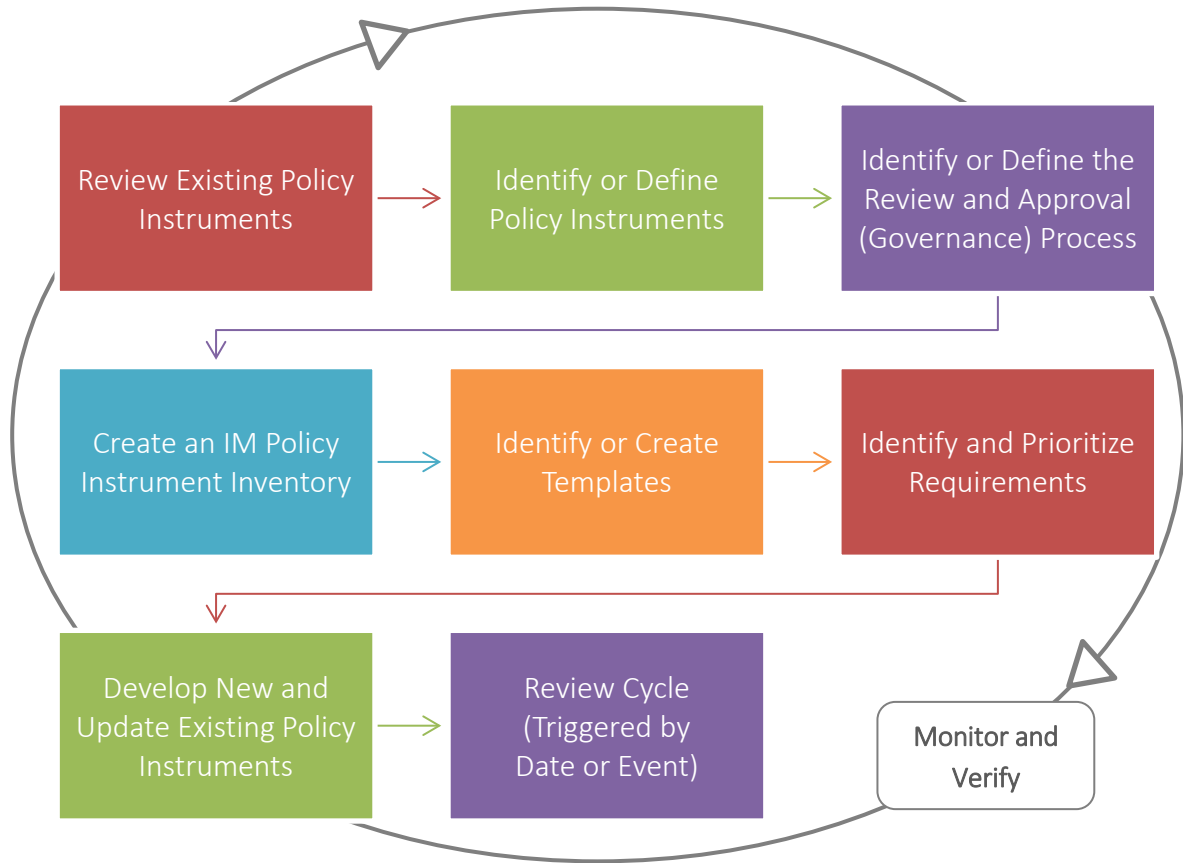
4.1   Review Existing Policy Instruments

A solid understanding of the existing materials is the first step in developing a set of organizational policy instruments. Create an IM Policy Instrument Listing that references materials that already exist either externally or internally. This listing will also minimize the likelihood that the department or other public body will duplicate effort in research and development of instruments that stakeholders, such as OCIO, may have already vetted and approved.

Consider the following when reviewing existing materials:

— OCIO's website contains policies, directives, standards, guidelines as well as other supports, such as Webpages, FAQs, FYIs, Quick Reference and Re-Use materials for both public body employees and IM professionals;

— other IM Stakeholders such as Cabinet Secretariat and the ATIPP Office;

— internal policy instruments that provide IM direction;

— internal materials often in email message format that provide direction on IM topics; and

— the organization's IM Legal and Regulatory Framework.

Note: Public bodies should reference OCIO policy instruments where possible and develop internal instruments only when necessary to support compliance with the direction stated within OCIO issued policy instruments.

4.2   Identify or Define Policy Instruments

Departments and other public bodies may already have in place templates and other requirements for policy instruments. Ensure to leverage existing processes and resources and only if necessary define and create new IM policy instruments and templates.

Departments and other public bodies are encouraged to establish consistent terminology related to policy instruments and accommodate any terminology; specific to the organization, that staff will recognize and know how to apply.

The generally accepted hierarchy of policy instruments is:

1. Policy
2. Directive
3. Standard
4. Guideline
5. Procedure

Defining and templating policy instruments as well as additional supports such as FAQs, FYIs, etc. can provide significant value to the department or other public body through increased organizational awareness and understanding. Create materials that provide

utility and accommodate various learning styles or communication channels and leverage opportunities such as IM month or Cybersecurity Awareness month to share existing information in new ways.

4.3   Identify or Define the Review and Approval Process

The review and approval process requires definition for each type of policy instrument. Identify the current process within the organization for the review and approval of policy instruments. IM policy instruments should be able to follow the same or very similar governance process. The creation of a new IM governance process should only occur if there is no process currently in place within the department or other public body.

Defining this governance process involves a variety of stakeholders and where possible should align with current governance processes, if they already exist, within the department or other public body.

Stakeholders that may be engaged in these processes include:

—— the Senior Executive within the department or other public body should provide approval for selected type of instruments;

—— the Executive responsible for IM within the department or other public body should provide approval for selected type of instruments;

—— the legal counsel responsible for advice and guidance on IM-related issues including legislative and regulatory requirements for records retention and disposal;

—— the department or other public body's Access to Information and Protection of Privacy (ATIPP) Coordinator;

—— the divisional or program area management team;

—— the Director or Executive responsible for policy development within the department or other public body; and

—— the Director responsible for internal communications within the department or other public body.

Ensure that each of the stakeholders understand their role and responsibilities and document the information for future reference. Further information is located in OCIO's GuideBook: IM Governance, Accountability and Organization Guideline.

4.4 Create an IM Policy Instrument Inventory

There may already be IM policy instruments within the department or other public body. Gather the information and create an inventory of any existing IM policy instruments. The table below highlights recommended information to include in the inventory. A sample inventory is included in the IM Policy Instrument Inventory – Template and Example file found on the OCIO website.

Consider the below when creating an IM Policy Instrument Inventory.

— Classification and document references for electronic content management system;

— Document controls such as managing versions;

— Tracking and managing the graphics and other inserted materials within the documents;

— Naming convention for internal documents but also website publishing standards;

— Maintaining the original issue date and documenting the last review date;

— Establishing an acceptable and consistent review cycle (based on capacity and likelihood of change); and

— Documenting other criteria, such as those noted below:
  o instrument type and compliance level
  o policy instrument owner
  o review status
  o published location & audience
  o topic/information tags
  o linkage to legal, regulatory or operational requirements.

4.5   Identify or Create Templates

Having templates for all policy instruments and support materials facilitates consistency. The content within a template serves as a checklist making it easier to prepare a policy instrument and that the required information is included. Be sure to consult internally within your department or other public body to verify whether there are existing template requirements for policy instruments.

Visit the OCIO website to view available templates and other re-use materials. The implementation of these re-use materials is not mandatory but provided as examples; modification to meet the needs of the organization will still be required.

4.6   Identify and Prioritize Requirements

Follow the steps below in identifying and prioritizing requirements:

1. Based on the IM Policy Instrument Inventory identify policy instruments that must be updated using the new templates.

2. Create a listing of IM policy instruments that are needed using the categories and gaps identified in the Inventory. Existing documentation, such as those itemized below, may provide a good basis for this listing:

    a. IM assessment reports:

        i. Information Management Capacity Assessment Tool (IMCAT);

        ii. Information Management Self-Assessment Tool (IMSAT);

    b. IM Legal and Regulatory Framework; and

    c. IM Program Plan.

3. Reference the goals and objectives as identified in the department or other public body's IM Program Plan to prioritize this listing.

4. Assign resources to lead development, review and approval processes.

4.7   Develop New or Update Existing Instruments

As noted above departments and other public bodies should reference OCIO policy instruments where possible and develop internal instruments only when necessary to support compliance with the direction stated within OCIO issued policy instruments.

When developing policy instruments departments and other public bodies should:

— review available related types of work and ensure that the proposed instrument does not conflict with OCIO issued policies, directives or standards (e.g., Information Management & Protection Policy, Acceptable Use of the Government Network and IT Assets Directive, Instant Messaging Directive, etc.);

— consult with IM Advisory Services (OCIO) to verify whether OCIO has any existing information related to the area of development that can help guide the department or other public body;

— use the most current internal template to prepare draft policy instruments. This may mean transferring content that exists in a program area template or informal format to the approved template;

— follow a formal review and approval process;

— publish the policy instrument in a location and format accessible to **all** employees;

— communicate the policy instrument to **all** employees; and

— communicate the policy instrument to stakeholders.

Reference the OCIO's GuideBook: IM Education and Awareness for Employees Guideline to support the implementation, adoption and reinforcement of policy instruments.

4.8   Review Cycle

Assign responsibility for ensuring that IM policy instruments are reviewed and updated, as required, based on a regular schedule or triggering event; keeping the IM Policy Instrument Inventory updated will make this process easier. Reviewing policy instruments including supports ensures that content is valid, accurate and that any linkages on websites or intranets are working properly.

4.9   Monitor and Verify

A review and validation of program compliance, performance and capacity are the mechanisms for monitoring and verifying IM.   IM policy instruments, templates and supports need to be lifecycle managed to ensure they are providing accurate and relevant information to the organization and assessed to validate that they continue to support IM performance and capacity development.

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 OCIO policy instruments through education and awareness, directors responsible for IM within a department or other public body should develop their own policy instruments and framework to support internal legal, regulatory and operational requirements. Such policy instruments must not contradict the policies, directives, and standards established by the OCIO under the authority of the IM&P Policy.

Office of the Chief Information Officer

As part of OCIO's mandate, the OCIO

— defines, develops and publishes IM&P policy instruments as needed;

— is responsible for IM&P policy instrument lifecycle management;

— implements appropriate communications regarding IM&P policy instruments; and

— manages, maintains and monitors IM&P policy instruments for effectiveness and compliance.

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.htm

Access to Information and Protection of Privacy Act, 2015
http://www.assembly.nl.ca/Legislation/sr/statutes/a01-2.htm

Rooms Act
https://assembly.nl.ca/legislation/sr/statutes/r15-1.htm

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
2011-05-20	Version 1
2015-03-31	Version 2
2019-04-04	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 Policy Instruments Guideline and are published independent of this document on the OCIO website, https://www.ocio.gov.nl.ca/ocio/im/practitioners/chart.html.

Appendix	Title
A	IM Policy Instrument Guideline – Checklist
B	Quick Reference – Records and Information Management System
C	IM Policy Instruments Listing – Template and Example
D	IM Policy Instrument Cover Page and Outline – Template and Example
E	IM Policy Instrument Inventory – Template and Example

Other GuideBook References:

IM Governance, Accountability and Organization Guideline

IM Education and Awareness for Employees Guideline

IM Legal and Regulatory Framework Guideline