Guideline

Records Storage and Imaging

Governance

Authority:	MOIA
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:

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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

A department or other public body uses the Records Storage and Imaging Guideline to support compliant information management practices which ensure the secure management and storage of all records regardless of format including:

— physical records (e.g., paper, CDs, DVDs, jump drives, photographs, film, maps etc.);

— electronic records (e.g., video, audio, graphics, etc.); and

Most all IM Programs contain records that need one or more of the below requirements depending on the organization's IM Legal and Regulatory Framework and approved disposition authorities.

1. Physical Record Storage

2. Electronic Record Storage

3. Imaging 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, as they take into consideration the varying nature of information management programs.

2.0   Purpose

The Records Storage and Imaging 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.

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 Information Storage - Document Imaging**
- 2.7 Information Protection

3.0 Tools

- 3.1 Records and Information Inventory
- 3.2 Classification Plan for Operational Records
- 3.3 Disposal of Records

Graphic: 1 - GuideBook Contents

Expected Deliverable

The development of processes that provide an understanding of the organization's records and information storage requirements particularly when imaging records.

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.

Disposition – the range of processes associated with implementing the final stage in the life cycle of a record. Disposition could include destruction, transitory, transfer decisions and permanent retention by departments or other public bodies. (Source: OCIO)

Disposition Authority – the written authorization for a public body to carry out the range of processes associated with the final stage in the lifecycle of a record, including retention, destruction, transfer, or transitory activities. (Source: OCIO)

Imaging Records – following strict control guidelines and established procedures to ensure the accuracy, reliability and trustworthiness of resulting scanned images.

Information Asset – a body of information, defined and managed as a single unit so it can be understood, shared, protected and exploited effectively. Information assets have recognizable and manageable value, risk, content and lifecycles. (Source: The National Archives, UK)

Information Management – the field of management responsible for establishing and implementing policies, systems, and procedures to capture, create, access, distribute, use, store, secure, retrieve, and ensure disposition of an organization's records and information. (Source: ARMA)

Integrity – the property of safeguarding the accuracy and completeness of assets. Integrity demonstrates that the record is complete and has been unaltered. It is necessary that a record be protected against unauthorized alteration. Records management policies and procedures should specify what additions or annotations may be made to the record after it is created, under what circumstances additions or annotations may be authorized, and who is authorized to make them. Any authorized annotation, addition or deletion to a record should be explicitly indicated and traceable. (Source: ISO 15489:2001 and ISO 13335-1:2004)

Metadata – data about data elements including data descriptions access paths, access rights and data volatility describing records, records systems, documents or data, including but not limited to the evidentially significant facts of:

  i)   Their contents, definition, function, logical and physical structure, retention and disposition;

  ii) Their sources and origins;

  iii) Their relationships with other entities;

  iv) Any additional evidentially significant facts regarding their creation, acquisition, modification, maintenance and use including those individuals or organizations that have been active in or otherwise responsible for those activities and their mandate or purpose for having been so engaged. (Source: CAN/CGSB-72.34-2005)

Public Body – As defined under the MOIA:

  i)   a department created under the Executive Council Act or a branch of the executive government of the province,

  ii) a corporation, the ownership of which, or a majority of shares of which, is vested in the Crown,

  iii) a corporation, commission, board or other body, the majority of the members of which, or the majority of members of the board of directors of which, are appointed under an Act of the province, the Lieutenant-Governor in Council or a minister of the Crown,

  iv) a court established under an Act of the province, and

  v)   the House of Assembly and committees of the House of Assembly. (Source: MOIA)

Record – a correspondence, memorandum, form, paper, parchment, manuscript, map, plan, drawing, painting, print, photograph, magnetic tape, computer disc, microform, electronically produced document and other documentary material regardless of physical form or characteristic. (Source: MOIA)

> **Active Record** – a record needed to perform current operations or ongoing business matters. It is consulted frequently, and it must be conveniently available for immediate reference, either manually or via a computer system. Active records may be stored onsite or online to support the flow of business. (Source: ARMA)

> **Corporate Record** – often referred to as an administrative record, are those created by all organizations to support administrative functions, including human resources, general administration, facilities management, financial management, information and information technology management, and equipment and supplies (material) management. (Source: CRIMS)

Government Record – a record created by or received by a public body in the conduct of its affairs and includes a Cabinet record, transitory record and an abandoned record. Disposal of a government record must be sanctioned by a records retention and disposal schedule (RRDS) or One Time Disposal that has been approved by the Government Records Committee (GRC). (Source: MOIA)

Operational Record – a record that reflects the unique mandate of an organization. Records of programs, projects, and service delivery are examples of operational records. Unlike corporate records, these will be different in each organization. (Source: OCIO)

Semi-Active Records – those that do not have to be readily available in primary offices but which still need to be kept for the possibility of use or reference. These records should be stored in appropriate offsite storage facilities. (Source: OCIO)

Transitory Record – a government record of temporary usefulness in any format or medium having no ongoing value beyond an immediate and minor transaction or the preparation of a subsequent record. Transitory records can be securely destroyed when no longer of value without authorization of the Government Records Committee. (Source: MOIA)

Vital Records – records that are fundamental to the functioning of an organization. Certain vital records contain information critical to the continued operation or survival of an organization during or immediately following a crisis. Such records are necessary to continue operations without delay under abnormal conditions. They contain information necessary to recreate an organization's legal and financial status and to preserve the rights and obligations of stakeholders, including employees, customers, investors, and citizens. Some vital records may be unique and not easily reproducible, or the cost of reproduction or replacement may be considerable. They may be required in their original form to meet or fulfill evidential requirements. The term vital records also includes documentation subject to a vital records program such as pertinent IT systems, help manuals, or emergency contact lists. (Source: ANSI/ARMA 5-2010)

Reliability – the degree to which a record performs specified functions under specified conditions for a specified period of time. (i.e., accessible when required for use). (Source: ISO 25000)

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
GRC	Government Records Committee
ERMS	Electronic Records Management System
IM&P	Information Management and Protection
IP	Information Protection
MOIA	Management of Information Act
OCIO	Office of the Chief Information Officer
OCR	Optical Character Recognition
OPR	Office of Primary Responsibility
PRC	Provincial Records Centre
PSDC	Planning and Service Delivery Committee

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, implementation and management of an effective IM Program through the development of Records Storage and Imaging processes.

After reading this document, a department or other public body should be able to apply the knowledge and have an understanding of the organization's records and information storage requirements when imaging records.
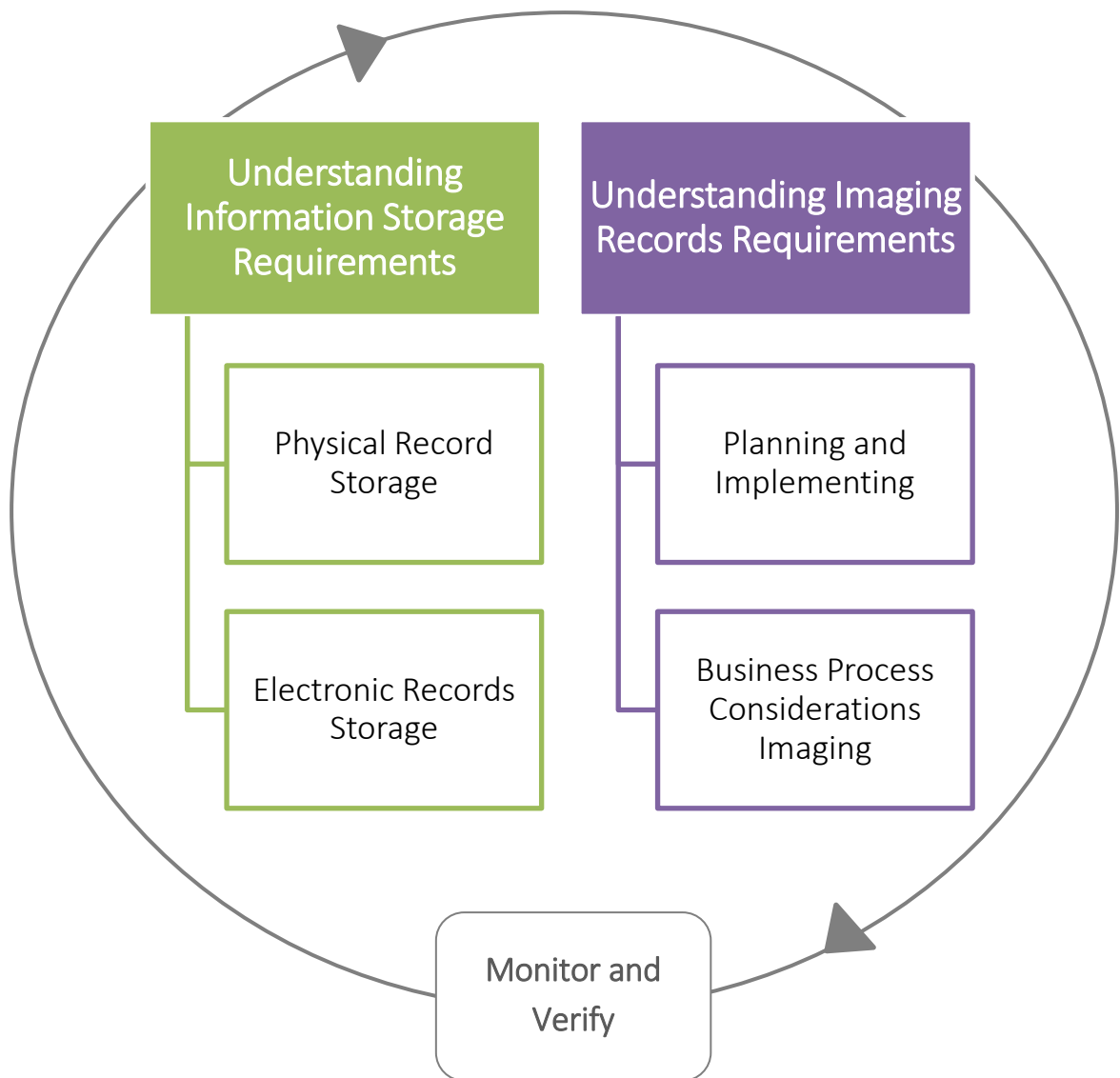
Graphic: 2 - Recommended Approach

4.1   Understanding Information Storage Requirements

Standardized and approved storage requirements for records and information is critical to a successful IM program. Whether creating processes to manage physical records, and/or electronic records, the questions in the following table will help in documenting the information lifecycle:

Sample Questions for Consideration and Discussion
☐ Who creates the records (i.e., business owner)?
☐ In what format are the records when they are created/received (i.e., paper, electronic)?
☐ How long do records stay with the business owner?
☐ How will records be cataloged?
☐ Is there an approved disposition authority for the records?
Physical Records
☐ When are records typically sent to the storage location?
☐ How is the transfer to storage location initiated and completed?
☐ How will users request access to records in storage location?
☐ Are there any special storage requirements for records (i.e., humidity)?
☐ What happens to physical records once they are imaged/scanned?
Electronic Records
☐ What format should be used for scanning physical records?
☐ How will records be protected and secured (i.e., access control)
☐ What software should be used for records born digitally (standardized) (i.e., pdf)?
☐ What metadata should be captured on the records?
☐ Will Optical Character Recognition (OCR) be required?

A consolidated records and information storage approach supports:

—— Real-time accessibility to records to support decision making

—— Reduce reliance on geographic proximity to records

—— Consolidate physical and/or electronic records to enable users to easily access a complete file

—— Increase automation disposition to improve compliance with regulatory requirements

—— Reduce transitory records retention

—— Reduce the handling and use of fragile or heavily used records and create a "back up" copy for delicate material such as brittle books or maps

4.1.1 Physical Record Storage

The storage of physical records is challenging for many departments and other public bodies. Requirements for square footage, cabinets, boxes, environmental protections, retention periods, protection, and overall searchability and retrieval are all concerns that affect an IM Program's efficient management of physical records.

The inclusion of IM practices in ongoing business activities facilitates the transition of records from active to semi-active to disposition. Where possible and regulatory feasible, it may be advantageous to minimize physical records management requirements by developing and implementing Records Retention and Disposal Schedules (RRDS) as a regular course of business.

When identifying requirements for physical storage it is important to consider that active records should be retained onsite as per the RRDS. If the department determines that the retention period identified in the RRDS is no longer appropriate, (e.g., the active period should be increased or decreased) then the RRDS can be modified via a memo to the GRC.

The OCIO promotes two options for the storage of semi-active physical records:

—— The Provincial Records Centre (PRC): The PRC is operated by the OCIO. It provides secure storage for government records that fall within its mandate. Records accepted by the PRC generally include: vital, confidential, archival.

— Third Party Storage: Departments are encouraged to use third party offsite storage for the storage of semi-active government records which do not meet the criteria for storage at the PRC. Abandoned buildings, hallways, janitorial closets, basements and other similar places should not be used to store semi-active records. The Public Purchasing Agency (PPA) maintains Master Standing Offer Agreements (MSOA) with third parties for the secure storage of records. Contact your financial operations officer to access the most updated MSOAs.

Departments and other public bodies must follow secure destruction practices when disposing of physical records.

4.1.2 Electronic Record Storage

The move to electronic records storage does not eliminate risks rather; it introduces additional considerations related to access, format, storage location and custodianship.

Having an electronic centralized storage of records and information can support service continuity in the event of a disruption but can also increase other risks related to cybersecurity. Working closely with all stakeholders related to your information assets will support a compliant risk-based approach to your records and information storage.

4.2 Understanding Imaging Records Requirements

Records imaging refers to the transformation of printed records into electronic format. There are many reasons why a department may decide to develop imaging services and declare electronic records as official records of the organization.

When considering imaging records, there are actions required to ensure that records are appropriately received, prepared, indexed and verified. Each of these phases must be carefully planned to ensure that the resulting imaged/scanned records are of high quality, accessible to users and managed properly. A resource link can be found in the in the supporting materials section explaining a number of options to consider when imaging records.

4.2.1 Planning and Implementing

When planning to carry out imaging services, there are a number of important issues to consider as shown below.

Record Value	Software Requirements	Storage Requirements	Accessability and Metadata
Integrity and Security	Quality Control	Disposition	Change Management

A resource link can be found in the in the supporting materials section with more information when imaging records.

Record Value

Determining a record's value is important when deciding which records to image/scan. More attention may be given to image/scan high-value records while the decision may be made to continue retaining the low-value records in physical format. The following table can assist in determining the value of a record.

Characteristics	Records to Image (Electronic Format)	Records to Retain (Physical Format)
Record Use	☐ Essential to provision of service ☐ Support business transaction or client ☐ Needed for collaboration ☐ Multiple users at one time may require access	☐ Administrative files ☐ Uncertain level of demand ☐ Limited number of users ☐ Used for reference only
Location of Users	☐ Users geographically dispersed ☐ Users require immediate access ☐ Access can be delayed by transporting physical records	☐ Limited number of users located onsite
Office of Primary Responsibility (OPR)	☐ Department is OPR and is responsible for retention and disposal	☐ Department is not OPR – records involve collaboration with other department/public bodies
Rate of Use	☐ Frequently used, required to support critical operations	☐ Infrequent access (less than once every 3 months)
Security and Access	☐ Sensitive information – with ability to control and track user access	☐ Publically accessible information requires no security measures
Disposition	☐ Records have a final disposition of destroy	☐ Records that have a final disposition of archive
Disposition (Length of Retention)	☐ Retention is required for an extensive time period	☐ Records with a short retention many not warrant costs of imaging
Disposition (Retention Format)	☐ Records can be retained in electronic format provided quality imaging procedures are used	☐ Records must be retained in physical format (due to legislative requirements, etc.)

Characteristics	Records to Image (Electronic Format)	Records to Retain (Physical Format)
Disposition (Conservation Issues)	☐ Records are compromised and cannot be handled in current condition ☐ Imaging records will preserve fragile physical format	☐ Records are copies or can be easily reproduced

Software Requirements

Imaging services require both the scanner used to capture an image of the physical record as well as software that enables the record to be processed after imaging. Imaging software packages offer a range of benefits to accommodate business needs.

Software functionality	Description
Batch processing	Ability to process multiple individual records
Barcode Integration	Ability to read/apply barcode data to records
Optical Character Recognition (OCR)	Ability to extrapolate data from imaged records and apply it as metadata, to enable better searching
Intelligent Character Recognition	Ability to extrapolate handwritten data from imaged records and apply it as metadata, to enable better searching
Image upgrade	Ability to upgrade image quality (e.g., adjust brightness and contrast)
Annotation tools	Ability to add notes to records (e.g., electronic post-it)
Workflow Integration	Ability to define and automate a business process that will route the imaged record to user for approval or action
Integration	Ability to integrate with specific business applications including case management or redaction software used for access requests

Understanding the business need, regulatory requirements and vital records impacts is critical to ensuring the right software is chosen and properly configured.

Storage Requirements

How and where records are stored has an impact on the overall imaging service. Imaged records can be stored in various locations including shared drives, Electronic Records Management Software (ERMS) or in offline storage. Users must consider many factors when deciding where records will be most efficiently stored. Factors include:

—— existing IM practices in the department (e.g., ability to use workflow);

—— security considerations (e.g., will access require monitoring);

—— storage space, imaged/scanned records typically require a larger amount of storage space than traditional documents (e.g., word processing). It is important to ensure that the storage space required is accurately estimated and can be accommodated by the OCIO.

Accessibility and Metadata

Imaged/scanned records need to be organized in a way that ensures accessibility. Electronic records benefit from the use of metadata, or information about the record, that can make it easier to retrieve and manage it. Elements like the file name, client number (#), record date, classification, type of record, access and security, are examples of record metadata. The best time to add metadata about a record is at the point when it is imaged/scanned. Some software applications automatically populate metadata or allow for predefined lists that make it easier to capture.

Metadata Considerations
Knowing how users will need to access and use the information is important to consider when establishing metadata. (i.e., monitoring and reporting needs)
Retention, disposal and security requirements are needed to facilitate metadata requirements and for the preservation for PRD records for archival electronic versions.
Be reasonable in what metadata you expect individuals to capture. While it may be possible to record extensive information about each image, is it necessary?
Understand what metadata can be automatically populated based on set properties, a barcode or even data from another business application.
Ensuring that users have a clear understanding of how to apply metadata is important in ensuring that it is consistently applied to all records.

Integrity and Security

Integrity means safeguarding record accuracy and completeness. From an imaging perspective, this means that the scanned copy must be an accurate reflection of the original and that it has not been modified during the imaging process. Implementing quality control in imaging services is important to support a records reliability and integrity. Any authorized annotation, addition or deletion to a record should be explicitly noted. A benefit of imaging is that software can be used to automatically annotate records.

Quality Control

A successful imaging service relies on high-quality images. Quality control provides the ability for users to have clear and reliable content on which to base business actions and decisions. If the quality of the imaged record is questioned, it may decrease confidence in the record to act as authentic and reliable. Imaged/scanned records of poor quality compromise the ability of records to act as electronic evidence of the government's business activities.

It is important that a review of the imaged record be conducted regularly to ensure the quality and ability for OCR to read text in images are sufficient. Establishing clear quality assurance practices and periodic audits of image quality (e.g., random samples) will ensure ongoing quality of imaging services.

Disposition

The development and application of disposition authorities (retention and disposal) is important to the information lifecycle. Applying disposition authorities, such as RRDS for Operational Records, and Transitory Records Directive will support an efficient implementation. When information is imaged/scanned, it is important, where relevant, that the department or other public body designate the electronic information as the official government records. Once a quality assurance process is followed for the newly imaged/scanned records, the former physical records should be securely disposed.

Change Management

Establishing business processes throughout the information lifecycle is a key component to operating a compliant IM Program. Change management supports the business by aligning both people and processes to the strategic requirements of the organization and assists the organization achieve its business goals.

Additionally, when planning to image/scan records it is important to consider the impact that the electronic component will have on the employees. It will be important for employees to receive education and awareness on the new business processes.

This may include:

— Knowledge of cataloging, or adding metadata

— Understanding of imaging techniques

— Understanding of quality assurance

Individuals who are accustomed to accessing their records in paper format will need to understand the new processes for accessing imaged/scanned information. They will require guidance on how to engage services, how to access and modify records, how to ensure proper security over the records, and where to go for support when required. Education, ongoing awareness and support will ensure that the introduction of the new electronic processes are successful.

In some instances, outsourcing to third party services may be required for imaging. Outsourcing is often used when there is a large volume to image/scan or a backlog of records to migrate.

The following should be considered if outsourcing:

— Department or other public body pay for cost of documents only; not equipment or staffing.

— Contract specifications with third party must be clearly defined up front, keeping compliance requirements in mind.

— Originals must be transported, shipped, and then handled by third party staff. Sensitivity of information must be considered.

— Imaging will be completed faster, as third party has dedicated resources.

4.2.2 Business Process Considerations for Records Imaging

Establishing formal business processes for the imaging of an information backlog is important. Determining the business need is the first step in developing imaging processes.

When determining business needs consider the following:

Document the Lifecycle – The lifecycle refers to the stages through which information is managed. It is important to manage records in a manner that supports authenticity, reliability, integrity and usability throughout all stages including creation; receipt and capture of data; retrieval, processing, dissemination and distribution of data; storage, maintenance and protections; and disposition, including secure destruction or transfer to the Archives. Documenting the typical lifecycle of the records that will be imaged/scanned will be helpful in finalizing requirements and developing operational procedures.

The Information Life Cycle

Complete a Records and Information Inventory – When completing an inventory note special considerations that will influence the imaging process, including special format or conservations issues; backlog volume; estimated volume (daily, monthly, and/or annual volume); and post considerations.

Review or Create Disposition Authorities – Update or create a RRDS for the records that will be imaged/scanned. This will ensure imaging processes are documented and approved by appropriate stakeholders including The Rooms Provincial Archives.

Technical Consultations – In planning imaging services, it is essential to consult with IT experts on the options available. They can provide advice on necessary equipment and software, and recommend the best location to store digitized records. Contact the Planning and Service Delivery Committee (PSDC) chair to consult with OCIO on technical requirements.

Develop a Business Case / Requirements – If implementing a new imaging service, it may be necessary to develop a business case. Based on your assessment estimate the resources required to establish and operate the imaging service. This may include procurement of hardware/software, physical space to accommodate services, and employee salary and support costs. Contact the Planning and Service Delivery Committee (PSDC) chair to assist with developing a business case.

4.3 Monitor and Verify

A review and validation of an organization's information storage – imaging processes are the tools for monitoring and verifying IM. An organization's records and information storage components, in addition to any imaging processes, should be reviewed annually to ensure they are still providing accurate and relevant information to the organization.

These elements should also be assessed to validate that they continue to support an accurate reflection of the organization.

5.0   Roles and Responsibilities

Deputy Minister or Permanent Head or Designate (Department or other Public Body)

— Support the department or other public bodies' compliance with MOIA as well as OCIO-issued policies, directives, standards and guidelines, and ensure that proper protocols are in place to properly develop and manage a records and information management system, often referred to as an IM Program.

— Support the development, maintenance and continual improvement of records and information storage in the organization's IM Program.

Directors responsible for IM

— Align organization-issued materials with the guidance provided by the OCIO in the development and implementation of compliant records and information storage within the organization's IM Program.

— Apply a continual improvement approach to the management of the organization's IM Program to ensure the review and inclusion of all records and information assets in managed storage solutions.

Office of the Chief Information Officer

As part of OCIO's administration of the MOIA, the OCIO:

— Recommends to Treasury Board policies for adoption.

— Develops, manages, monitors, and communicates IM&P policy instruments and supporting materials to departments and other public bodies.

— Provides direction on IM&P best practices, resource requirements, organizational structure, recordkeeping systems and IM Programs to departments and other public bodies.

— Assists departments and other public bodies to improve their IM&P capacity.

— Provides IM&P advisory, training and awareness services and support to departments and other public bodies.

— Supports IM forums, committees, and other professional practice communities, consisting of IM representatives from departments and other public bodies.

— Manages the Provincial Records Centre (PRC).

— Provides administrative support to the Government Records Committee (GRC).

In addition, the OCIO will:

— Develop, implement and maintain this Guideline as well as the GuideBook, also known as the Guide to IM for Public Bodies.

— Provide education and awareness on the implementation of compliant Records and Information Storage.

6.0   Supporting Materials and Version History

Supporting Materials

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

Management of Information Act
http://www.assembly.nl.ca/Legislation/sr/statutes/m01-01.htm

Information Management and Protection Policy
https://www.gov.nl.ca/exec/ocio/im/policy-instruments/im-ip-policy

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

GuideBook – Guide to IM for Public Bodies
https://www.gov.nl.ca/exec/ocio/im/policy-instruments/guidebook

GRC Advisory – Designating Electronic Information as the Official Government Record
https://www.gov.nl.ca/exec/ocio/files/fyi-grc-advisory-designating-electronic-as-the-official-government-record.pdf

FYI – Managing Digital Online Services
https://www.gov.nl.ca/exec/ocio/files/FYI-Managing-Digital-Online-Services.pdf

FYI – Cloud-Based Storage Services
https://www.gov.nl.ca/exec/ocio/files/im-employees-pdf-cloud-based-storage-services.pdf

FYI – Protecting Paper Records
https://www.gov.nl.ca/exec/ocio/files/im-employees-pdf-protecting-paper-records.pdf

FYI – Information Protection – USB Drives – What You Should Know
https://www.gov.nl.ca/exec/ocio/files/im-employees-pdf-fyi-information-protection-usb-drives.pdf

Disposition Directive
https://www.gov.nl.ca/exec/ocio/files/directive-disposition.pdf

Smithsonian Institution Archives – Recommended Preservation Formats for Electronic Records

https://siarchives.si.edu/what-we-do/digital-curation/recommended-preservation-formats-electronic-records

OCIO Website

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

Version History

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

Date (yyyy-mm-dd)	Version
2022-08-23	1.0

Appendices

Appendices listed below directly relate to the Guideline – Records and Information Storage and are published independent of this Guideline on the OCIO website, https://www.gov.nl.ca/exec/ocio/im/policy-instruments/guidebook.

Appendix	Title
A	Checklist – Records and Information Storage
B	Quick Reference – Records and Information Management System
C	Procedural Considerations – Imaging Services
D	Procedural Considerations – Records Storage
E	Checklist – Image Quality Control (Sample)

Other GuideBook References:

Records and Information Inventory

IM Education and Awareness for Employees

Education and Awareness for IM Professionals