ASSURANCE REPORT

PROCESSES TO PROMOTE AND MAKE DOCUMENTARY HERITAGE AVAILABLE

**INTERNAL AUDIT FUNCTION
AUDIT AND EVALUATION DIRECTORATE**

March 2012

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EXECUTIVE SUMMARY

Background

An assurance engagement of the processes to promote and make documentary heritage available was included in the Risk-Based Audit Plan following the June 2010 decision of the Departmental Audit Committee of Library and Archives Canada (LAC). The engagement work was conducted from December 2010 to October 2011. The objective was to assess the relevance and effectiveness of governance, risk management and internal controls to promote and make documentary heritage available to achieve departmental strategic priorities, including those related to the modernization of LAC and its commitment toward citizen-focused services. This assurance engagement provides a lower (moderate) level of assurance than an audit. The Treasury Board Secretariat of Canada (TBS) Policy on Internal Audit was used as a reference document during the conduct of this engagement.

The Resource Discovery Sector (RDS), responsible for promoting and making documentary heritage available, was in the process of redefining its mandate and reviewing its organizational structure and operational processes during the course of this engagement. The report concludes on the measures in place during the testing period while giving consideration to initiatives currently underway.

Promoting and making documentary heritage available includes all services provided to clients as well as some activities to develop and establish collaborative arrangements. To increase accessibility and to respond to changing user needs and expectations, LAC is leading a major modernization exercise. Six of the twelve modernization innovation initiatives (MIIs) will have a major impact on the accessibility to the collection. The RDS is working on finding the best strategies to improve access and take advantage of new technological opportunities to meet user expectations.

Findings and Recommendations

<u>Governance</u>
The RDS needs to develop a comprehensive access strategy to ensure that its activities are in line with the modernization objectives and respect the intent of the *Library and Archives of Canada Act* ("LAC Act") in terms of accessibility to Canadians and to anyone with an interest in Canada. It should also reinforce its accountability framework through a more integrated planning process and an organizational structure reflecting the service strategy in development. The RDS

currently provides services to a limited segment of the population and it needs to develop new instruments to identify the interests and the requirements of the Canadian population in its entirety. Client feedback which is captured and shared with senior management on a regular basis should also be fed into the planning exercise.

Risk Management

The risk that documentary heritage is not accessible to Canadians has been identified as a strategic risk in the Corporate Risk Profile. The RDS has assessed the risks involved with the MIIs under its responsibility in the MII charters. In addition, risks were identified when developing options for the Access Policy Framework, discussed at the Management Board, and are also considered under the Framework on Managing Partnering Activities. However, there is no systematic and consistent risk assessment approach to cover all the on-going activities of the sector. Therefore, there is no assurance that risks are assessed based on the same criteria and weighting factors nor that mitigating measures are developed commensurate with the level of risk.

Internal Controls

The RDS has implemented controls to assess client satisfaction with their current services. They have developed service standards, which are tracked and reported against on a regular basis. In addition, they conduct surveys with the different categories of service users, the results of which are presented to senior management. However, the data captured covers only the regular users of LAC services and the members of LAC's network. The results from these good practices should serve as a basis for planning purposes and be reflected in the sector's work plans and objectives. While the RDS has a number of indicators already in place, there is insufficient data available to support a formal evaluation. Therefore, performance measures in line with the RDS proposed access strategy and departmental modernization objectives are required. One major internal control deficiency lies in the absence of formal policies and procedures to ensure constant and equitable treatment of the clientele. There is a need to implement policies and procedures to support the Access Policy Framework. Finally, the use of quality assurance mechanisms would provide additional control for the early identification of issues and problems likely to affect the achievement of the sector's objectives.
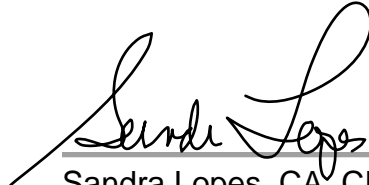
Overall Conclusion

The audit work allows us to conclude that special attention is required to the governance structure, risk management and internal controls to implement relevant and effective processes to promote and make documentary heritage

available. The new sector's strategic direction, policies, organizational structure and monitoring mechanisms will better respond to the modernization objectives and will be more in line with the intent of the LAC Act.

Statement of Assurance

The Internal Auditing Standards for the Government of Canada were used as a reference document in the planning and conduct of this moderate assurance engagement.

In my professional judgment, as Chief Audit and Evaluation Executive, sufficient and appropriate procedures, for a moderate assurance engagement, have been conducted and evidence has been gathered to support the accuracy for this level of assurance conclusion provided and contained in this report. The conclusion is based on a comparison of the conditions, as they existed at the time, against pre-established moderate assurance engagement criteria.

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Acknowledgements

Since the conduct phase of the assurance engagement, we understand that management has already initiated certain activities that will serve to address some observations mentioned in this report.

We wish to express our appreciation for the co-operation and assistance afforded to the internal audit team by management and staff during the course of this assurance engagement.

INTRODUCTION

Background

The assurance engagement of the Processes to Promote and Make Documentary Heritage Available (initially named Interpretive Public Programs) was included in the Risk Based Audit Plan upon a decision made by the Departmental Audit Committee (DAC) of Library and Archives Canada (LAC) in June 17, 2010.

As set out in section 7 of the *Library and Archives of Canada Act* ("LAC Act"), the objects (or mandate) of Library and Archives Canada includes the acquisition and preservation of the documentary heritage, to make that heritage known to Canadians and to anyone with an interest in Canada and to facilitate access to it, and to be the permanent repository of publications of the Government of Canada and of government and ministerial records that are of historical or archival value.

The Resource Discovery Sector (RDS) is responsible for most of the activities to promote and make documentary heritage available, such as the LAC website, reference and reproduction services, exhibitions as well as some of the partnering activities related to exhibitions and services. The Office of Stakeholder Relations and the Society and Governance Branch, which report to the Acquisitions Sector, are respectively responsible for developing collaborative arrangements with similar heritage institutions or organizations and for the development of strategies with other federal government departments to improve access to Government of Canada records and publications.

For 2011-2012, the RDS budget included 220 Full Time Equivalents (FTE) and an operational budget of $23.4 million[1].

The LAC collection is composed essentially of holdings in two distinct media: analogue and digital. The 2009-2010 Departmental Performance Report provides an overview of the size and diversity of the analogue holdings collection, which includes but is not limited to the following:

- more than 22 million books, periodicals, newspapers, microfilms, literary texts and government publications;
- more than 167 kilometres of government and private records;
- about three million architectural drawings, maps and plans;
- about 25 million photographs;

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[1] 2011-2012 LAC's Report on Plans and Priorities

- about 355,000 hours of film, video and sound recordings;
- Canada's portrait collection, which includes 21,000 works of art and thousands of caricatures;
- more than 560,000 musical items;
- more than 371,000 items from the documentary art collection, including watercolours, sketches, miniatures and oil paintings; and
- one million items from the philatelic collection.

The size of the digital holdings collection is estimated at two billion megabytes of digital content. This includes about 15 million images, and approximately 0.3% of the entire collection can be viewed online.[2]

Accessibility to the LAC collection is also governed by the application of other legislation such as *the Access to Information Act*, the *Copyright Act*, the *Privacy Act*, the *Personal Information Protection* and *Electronic Documents Acts*, the *User Fee Act* and the *Official Languages Act*.

To remain relevant in a rapidly changing information environment, LAC is rethinking the way it does business. As a response to this challenge, LAC has embarked on a modernization exercise to develop a policy-driven and evidence-based global strategy. Twelve modernization innovation initiatives (MIIs) will guide this exercise. All twelve MIIs will affect directly or indirectly the processes to make documentary heritage available, as acquisition and preservation strategies described in the MIIs will influence accessibility strategies and activities. However, the following six initiatives will have a major impact on the accessibility of documentary heritage:

- MII 1, Implement a strategy to guide LAC's external communications and its collaboration with stakeholders and partners, particularly in support of modernization;
- MII 7, Shift the method of how LAC makes and provides copies of documents to one of digital reproduction and storage;
- MII 8, Develop a new service model to provide Canadians with access to LAC's documentary holdings;
- MII 9, Shorten the time between acquisition of material and access to it and ensure that people can find and gain access to all of LAC's holdings;
- MII 10, Review, in the context of a pan-Canadian approach, LAC's service to documentary heritage institutions or organizations;
- MII 12, Develop a single metadata framework to describe information in LAC's holdings.

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[2] 2009-2010 LAC Departmental Performance Report

Objective and Criteria

The objective was to assess the relevance and effectiveness of governance, risk management and internal controls to promote and make documentary heritage available to achieve departmental strategic priorities, including those related to the modernization of LAC and its commitment toward citizen-focused services.

The following criteria were based on the Core Management Controls and the risk assessment conducted during the planning phase:

- o An effective governance structure is established to promote and make documentary heritage available;
- o The approach to managing risk to promote and make documentary heritage available is well communicated, understood and implemented by management; and
- o Management implements control measures to identify significant issues that could hinder the achievement of objectives.

Scope

The field work was carried out from December 2010 to October 2011 (except for the summer period, during which no work was performed). It covered all activities that support public access to Canadian documentary heritage, under the RDS, during the testing period of April 1, 2009 to November 30, 2010. Available documentation, until the end of the fieldwork, was considered when warranted. ATIP (Access to Information and Privacy), Copyright, Description and Contextualization of Documents (PAA 2.3.1), access to Government of Canada records and publication activities, and the interface with other organizational units involved in partnering activities were scoped out.

Methodology

This assurance engagement provides a lower (moderate) level of assurance than an audit. The Treasury Board Secretariat of Canada (TBS) Policy on Internal Audit was used as a reference document during the conduct of this engagement.

Specifically, the field work included a variety of moderate assurance procedures. These included but were not limited to the following:

- Review of documentation, such as policies, processes and work plans to promote and make documentary heritage available;
- Walkthrough and mapping of business processes and related internal controls;

- Interviews with key process owners and related personnel;
- Review of practices for risk management in the sector;
- Review of partnering activities and of selected agreements; and
- Testing of systems used by the RDS.

FINDINGS AND RECOMMENDATIONS

Governance

Criteria: An effective governance structure is established to promote and make documentary heritage available.

Finding: The governance structure in place during the assurance engagement period went through some changes that affected its effectiveness. Specifically, the current strategy to promote and make documentary heritage available did not fully address the intent of the *LAC Act* as it did not adequately provide access and make documentary heritage known to Canadians and to anyone with an interest in Canada. Moreover, the current RDS planning regime and organizational structure does not provide an effective accountability framework for all of the sector's activities. Finally, the organization was proactive in seeking feedback from stakeholders and users of its services and in leveraging collaborative opportunities. However, these actions were limited to the current client base.

Our assessment of the governance structure was based on the presence of the following elements: strategic direction, objectives and work plans supporting the strategic direction, clear roles and responsibilities, and finally, evidence that planning is driven by client interests and requirements.

The 2011-2012 Report on Plans and Priorities states: "Resource Discovery supports a client focus approach that enables Canadians to explore and interact with the collection LAC manages in trust for Canada".

The report also indicates that "Under modernization, LAC is exploring how best to facilitate access to Canadians documentary heritage by the largest number of people".

To facilitate the achievement of this objective, LAC is looking at a pan-Canadian and whole of society approach that includes use of LAC's online facilities and digitization and collaboration with others to organize exhibitions and programming events at sites across Canada. The use of non-technical language

to describe the items in the LAC collection will also facilitate access by more people.

LAC facilities and collections have been accessed and used by a small segment of the Canadian population, mostly members of academia, lawyers, historians and researchers, through LAC's website, reference and reproduction services, exhibitions as well as some of the partnering activities related to exhibitions and services. The LAC website is also used by Canadians who are searching their ancestry or are interested in the digitized collection of the Portrait Gallery of Canada. A survey conducted by LAC approximately three years ago concluded that, while 20% of Canadians are familiar with LAC's mandate, less than 2% know about the services it offers. These figures compare to those released by the National Archives and Records Administration of the United States. The LAC website should be more client-focused to encourage client participation. During the assurance engagement period, LAC website home page was clustered with a combination of corporate matters, collection information and activities for promoting documentary heritage.

The LAC 2007 Access Policy Framework that defined access as the "primary driver" and LAC's commitment to provide, "whenever possible, free and open access to its rich heritage collection" was never operationalized. LAC has since recognized the need to implement an access strategy through its modernization initiatives.

Under MII 8, the RDS is responsible for developing a new service model to provide Canadians with access to its documentary holdings today and in the future. The premise is that all incoming material will be openly and immediately discoverable and accessible and that all government documents must eventually be accessible. The sector has undertaken steps to achieve this objective. In August 2011 an Access Policy Framework was discussed at the Management Board meeting. The document defined the core principles underpinning the policy as well as an assessment of the options and risks involved. The RDS is also developing a new Service Delivery Model, which was discussed at the Management Board meeting in October 2011.

A review report on Governance of Service Delivery, issued in May 2010, by the internal audit function, made recommendations regarding the Services Advisory Board and Services Committee. These two advisory bodies, which were in place to ensure that LAC's strategies are appropriately and effectively citizen-focused, were: dismantled in the fall of 2010. Instead of establishing another advisory body, it was decided to use the Stakeholders Forum, as part of the external engagement strategy (MII1), under the responsibility of the Director General, Stakeholder Relations, during the modernization period.

There is a need to ensure that a new access strategy respecting the overall intent of the LAC Act, to make the collections accessible to Canadians and to anyone with an interest in Canada and to respond to the needs of current and future users, is implemented and supported by a robust and time-sensitive action plan and by an appropriate governance structure.

Recommendation 1:

The Resource Discovery Sector should complete the development of its global access strategy designed to respect the intent of the LAC legislation and to meet the current and future needs of Canadians. This strategy should be supported by an appropriate governance structure and by an Implementation Plan that will clearly set accountabilities and timeframe.

Management response:

Agreed. On November 28, 2011, Management Board approved the new Service Delivery Action Plan which includes an implementation plan, accountabilities and deadlines. The Action Plan is based on the four principles stated in the Access Policy Framework:

1. Documentary heritage must be *discoverable*—meaning that LAC communicates essential information about a documentary heritage resource, in the form of metadata, user-contributed content, or other contextual description;
2. Documentary heritage must be *available*—meaning that LAC addresses legal or policy constraints to ensure that documentary heritage can be consulted as soon as possible;
3. Documentary heritage must be *accessible*—meaning that LAC ensures that its holdings can be used by as many people as possible, including Canadians with print disabilities;
4. Discovery must be supported by *collaboration*—for example, LAC is collaborating with the Library of Congress on a global initiative to establish a new bibliographic framework to better serve its clients.

In 2010-2011 and 2011-2012, senior management asked sectors to give priority to innovation projects. Therefore, the regular planning cycle was interrupted in all sectors to focus instead on MII priorities.

The RDS developed charters for the MIIs under their responsibility, which provided high-level estimates for resources and deliverables. However, these were not integrated with the on-going activities of the sector. Consequently, the

RDS planning process was incomplete and the RDS did not submit operational work plans for the fiscal year 2011-2012.

Historically, planning was done independently by the directorates of the sector resulting in inconsistencies in process and a lack of coordination and integration between plans.

A more comprehensive and integrated planning process fostering coordination would ensure that resources are allocated to the higher risk areas throughout the sector. It would also enhance the accountability framework by increasing the ability to measure performance against clear objectives, work plans and deliverables.

Effective governance also requires an accountability regime based on clear roles and responsibilities. The organizational structure is based on the current service model, which is under revision, and it does not clearly allocate responsibility for deliverables and outcomes. Even during a transition period, mechanisms should be in place to ensure that roles and responsibilities are clear in terms of performance and results.

The RDS has recognized these deficiencies and is developing a new organizational structure and an integrated planning regime, in collaboration with relevant corporate functions. This planning format will allow the measurement of set performance indicators with expected results and objectives.

Recommendation 2: The Resource Discovery Sector should finalize and approve its organizational structure to reflect the access strategy under development and implement an integrated planning process to ensure that responsibility for results is clearly assigned and to promote accountability.
Management response: Agreed. The re-organization of the Resource Discovery Sector, announced to staff on June 28, 2011, was intended to be "an internal realignment with a view to deliver on our modernization and access mandates." This process will be re-examined following the LAC-wide re-organization announced in January 2012. The mandate of the Engagement and Coordination Office, which reports to the Chief Operating Officer, is to provide integrated sector-level planning functions. Beginning in the 2012-2013 fiscal year, all planning will be fully integrated.

The RDS has developed mechanisms to collect user comments and suggestions via the website, regular mail, on-line surveys as well as survey questionnaires given to visitors on site and public opinion research (POR). These comments, suggestions and data collected from surveys, questionnaires and POR are regularly reported to the sector's managers via the Quarterly Performance Report.

The organization has also established lines of communication with key stakeholders. Four times since the fall of 2010 LAC has met with participants from the archival, library and research communities to discuss how they can work together to enhance services to users. LAC also participates in conferences organized by national, provincial and territorial archives and library associations and meets regularly with representatives from these groups.

LAC has established a number of collaborative arrangements with provincial governments, universities, historical and archival associations, public and private companies and with other government departments to facilitate the promotion and access to documentary heritage. Examples include the Interlibrary Loan Services, the Portrait Gallery Program, the Ancestry collaborative arrangement and the TD Summer Reading Club.

However, these initiatives are aimed at a segment of the population already familiar with the services that LAC offers and already part of the LAC network. With the main objective of modernization being to make the collection known and accessible to the general Canadian population now and in the future, new and more pro-active instruments will be required to reach and sensitize this potential client pool. In addition, there is a need to ensure that the results of client surveys and consultation processes are formally integrated into planning processes to reflect client expectations. Together with a new organizational structure, this will serve to strengthen the accountability framework.

Recommendation 3: The Resource Discovery Sector should develop new instruments to identify the needs and interests of the current and future Canadian population.
Management response: Agreed. LAC will be undertaking a benchmark survey to progressively better understand the needs and interests of the Canadian population in February 2012. It will deliver statistics on Canadians' expectations, awareness, perceived value of LAC and their willingness to support LAC's mandate. The

survey will also gauge the attitude of Canadians to LAC's policies, programs and services.

Recommendation 4:

The Resource Discovery Sector should integrate the results of client surveys and consultation processes into the planning process.

Management response:

Agreed. Senior managers are involved in all LAC consultations. Management Board members participate in Stakeholder and Academic fora. Each executive leads or co-leads a project of the Pan-Canadian Documentary Heritage Network, which consists of collaborative projects underway with stakeholders.

The results of the routinely-administered client survey "LAC Listens", including satisfaction rates and analysis, are provided to senior managers regularly in the RDS Quarterly Reports. The client satisfaction rate with Web services is reported by the RDS to LAC senior managers through the Corporate Dashboard. Finally, client satisfaction measures are part of the corporate report to the TBS through a Management Accountability Frramework indicator. Client and stakeholder needs, as expressed through consultation and surveys, have influenced the choice of service improvements for many years at LAC, and will continue to do so. Service improvements made during the period under review are announced to the public in a "What's New" article at: http://www.collectionscanada.gc.ca/whats-new/013-551-e.html.

All survey results will be compiled and circulated to service managers and directors. A comparative analysis will be conducted on survey feedback and service trends to validate results and identify organizational performance issues. The planning documents for fiscal year 2012-13 will include performance measures and management's assessment of their significance.

In February 2012, a LAC-wide review and subsequent decision is expected regarding performance indicators.

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Risk Management

Criteria: The approach to managing risk to promote and make documentary heritage available is well communicated, understood and implemented by management.

Finding: The RDS has not implemented a formal and standardized risk management approach to ensure uniformity and consistency in the identification of risks and mitigation strategies for all its sectors of activity.

Our assessment was based on the expectation that a documented risk management process would be in place and well understood, and that the risks would be identified and mitigating measures developed and monitored.

In 2009, LAC published a document entitled *Handbook on Integrated Risk Management for Managers*. The *Handbook* does not provide a comprehensive approach to risk management and does not make a clear link between mitigating strategies and internal controls. It currently constitutes the major guidance material available to managers to assess operational risks and develop mitigating measures. A new version of the *Handbook* is under way and will be available to managers once revisions have been completed.

The Corporate Risk Profile identifies the risk that documentary heritage is not accessible to Canadians as one of the four main strategic corporate risks likely to hinder the achievement of the departmental mandate. The RDS has not adopted a formal approach to managing risks. It has, however, applied a risk model with success in some areas. During the review period, evidence of risk management in the RDS was mainly found in the MII charters. This was done summarily and, since the MIIs focus mainly on new initiatives, it does not include all on-going operations and activities in the RDS. There is also evidence that risks were identified when developing options for the Access Policy Framework. Finally, the Framework on Managing Partnering Activities contains standard documentation for the selection, risk assessment, monitoring and measurement of performance for partnering activities. However, since the approach to risk management in the RDS is not standardized, there is no assurance that similar criteria and weighting factors are used in ranking risks.

It was also noted that there was no evidence of involvement by LAC's Corporate Sector in the RDS's approach to risk management. There is a need to bring a more collaborative approach to the process by seeking input from, but not limited to, Finance, Legal Services, Human Resources and Strategic Research. This would ensure that all risk factors have been considered.

Recommendation 5:

The Resource Discovery Sector should adopt and implement a formal and consistent risk management approach. This approach should seek the involvement of other corporate sectors when warranted.

Management response:

Agreed. In 2009, LAC's management of risk was evaluated. The LAC Corporate Risk Profile was finalized in November 2011.   This document lists the risk responses proposed by LAC to meet the identified corporate risks to access, which include program or service design and delivery, and metadata.

In late 2011, LAC decided to restructure its operations around a Chief Operating Officer (COO) model. This model amalgamates all core business operations under one senior officer to ensure better coordination, collaboration and efficiency. As a result of this new model, the RDS ceased to exist on January 16, 2012. Most of it is now part of the Services Branch, and it is expected that the new Services Branch will also include all circulation operations and loans. The Services Branch will work closely within the COO Sector, with the Policy Branch and with the Corporate Sector to develop a risk management approach that will be integrated in its planning. As the accountabilities for planning have not yet been assigned in the COO Sector, it is difficult to identify a lead for risk identification and risk mitigation strategies for any of the branches within the COO Sector. It is also expected that the Corporate Risk Profile will need to be updated further with the adoption of the COO model.

Internal Controls

Criteria: Management implements control measures to identify issues that could hinder the achievement of objectives.

Finding: Management has implemented a number of control measures for current services. However, the lack of policies and complete performance measures hinder their ability to deliver services consistently and assess the achievement of objectives.

Our assessment of internal controls looked at the following elements: service standards well defined and monitored, policies and procedures in place, systems in place to collect accurate and complete information so that issues are identified

and addressed in a timely manner, and finally, performance measures serve to regularly report on program results.

Service standards for fee-based services are well defined and posted on LAC's website. The RDS prepares a Quarterly Performance Report to monitor a series of targets gauging the level of client satisfaction with services, reporting both positive and negative client comments. The report also provides statistical information on the number of documents delivered, the number of visits and inquiries received as well as the number of formal and informal ATIP requests received and completed, which is compared with the data from the two previous fiscal years. However, the Quarterly Performance Report does not report on compliance with established turnaround times for client queries. Response time satisfaction is assessed via client surveys.

Tests conducted on the Query Management System, the Collection Management System, the Client Information Management System and the Interlibrary Loan System concluded that adequate controls were in place during the testing period to provide reliable and timely information. However, the efficiency and effectiveness of the systems could be improved by initiating the capture of more information on collection use and automatically transferring common information between systems to eliminate duplication of effort. For instance, the information on stakeholders is kept on multiple electronic systems and there is no centralized comprehensive register of all LAC stakeholders. In addition, the information in the managerial reports referred to above is not automatically compiled, thus increasing the risk of transcription errors.

A main internal control deficiency lies in the absence of formal policies to ensure a consistent approach to promote and make documentary heritage available. During the time of this assurance engagement, a review of policies across LAC found that management could not identify what policies were in force and who was responsible for these policies. It was also noted that LAC does not have a formal process for developing and implementing policies. The main policies and procedures to support the RDS activities are being reviewed in the context of the modernization initiatives. It will be important to ensure that they support the implementation of the new strategic direction.

An effective governance regime also requires a clear definition of outputs and outcomes and a regular assessment of performance against expectations. Performance indicators for the RDS were found in a number of documents including the Report on Plans and Priorities, the Departmental Performance Report, the Quarterly Corporate Dashboard, the Performance Measurement Framework and the Results-Based Management Accountability Framework.

The Report on the State of Performance Measurement at LAC for 2010-2011 concluded that there is insufficient data available to support a formal evaluation in the RDS. LAC has recently taken an intermediary action to develop six key output indicators to monitor progress on modernization related activities. The more relevant indicators for the RDS are #4: Amount of material digitized by LAC and partners, #5 Use of LAC holdings and #6 Amount of material opened for client access. The amount of information available varies across these indicators with #5 being the most advanced and #6 the least advanced. Efforts are currently underway to define methodologies and strengthen data-collection processes.

Finally, as previously mentioned, because of the lack of rigour in the planning process, operational objectives were not always clearly defined for this period, limiting the ability to monitor their achievement.

The use of quality assurance mechanisms for monitoring services standards, performance measures and the consistent application of policies, guidelines and procedures would help ensure that internal controls work effectively to mitigate identified risks and that significant issues are identified and corrected in a timely manner to meet objectives.

Recommendations 6:

The Resource Discovery Sector should develop internal controls commensurate with identified strategic and operational risks and monitor results. Priority should be given to the development and implementation of policies and procedures.

Management response:

Agreed. LAC is developing a Framework for Policy Management, and policies addressing access.

Since the Access Policy Framework was approved by Management Board on August 29, 2011, policy decisions have been made and a policy instrument is in draft stage for Making Collections Available (concerning the strategic approach to legal and donor restrictions on access).

In accordance with the TBS approach to policy instruments, all new LAC policy instruments contain sections for clear statements of roles, responsibilities, monitoring and reporting. Consultation with all LAC sectors is the responsibility of the Policy Coordination Working Group. LAC is developing a Framework for Policy Management that will include a corporate and integrated approach to monitoring and reporting on the implementation of policy decisions and the

application of policy instruments.

Policy issues are currently being identified for accessibility of current and future collections, including copyright, official languages, people with disabilities, and user fees. All of these options are being developed with a commensurate consideration of risk.

Recommendations 7:

The Resource Discovery Sector should integrate the use of quality assurance mechanisms within its sector to monitor the application of policies and standards and ensure early detection of significant issues.

Management response:

Agreed. LAC needs to identify current quality assurance mechanisms and any gaps in monitoring the application of policies and standards.

APPENDIX A – MANAGEMENT ACTION PLAN

Recommendation	Action	Responsibility	Deadline
1. The Resource Discovery Sector should complete the development of its global access strategy designed to respect the intent of the LAC legislation and to meet the current and future needs of Canadians. This strategy should be supported by an appropriate governance structure and by an Implementation Plan that will clearly set accountabilities and timeframe.	Access Policy Framework Deliver the first phase of a New Service Delivery Action Plan, which is an implementation plan for access. Governance Structure	Director, Strategic Policy Director General Services	Completed and approved by MB March 31, 2012 Approved by the Deputy Head on January 24th, 2012
2. The Resource Discovery Sector should finalize and approve its organizational structure to reflect the access strategy under development and implement an integrated planning process to ensure that responsibility for results is clearly assigned and to promote accountability.	Manage re-organization of the RDS sector	Director General Services	March 31, 2012

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Recommendation	Action	Responsibility	Deadline
3. The Resource Discovery Sector should develop new instruments to identify the needs and interests of the current and future Canadian population.	Undertake benchmark survey to progressively better understand the needs and interests of Canadian population.	Director General Communications	March 31, 2012
4. The Resource Discovery Sector should integrate the results of client surveys and consultation processes into the planning process.	Demonstrate how the results from Stakeholder Fora and "LAC Listens" survey are integrated into planning.	Director, Engagement Coordination Office	2012-2013
5. The Resource Discovery Sector should adopt and implement a formal and consistent risk management approach. This approach should seek the involvement of other corporate sectors when warranted.	Services Branch will work with other sectors to develop a risk management approach.	Director General Services	2012-2013
6. The Resource Discovery Sector should develop internal controls commensurate with identified strategic and operational risks and monitor results. Priority should be given to the development and implementation of policies and procedures.	Creation of various policy instruments to make collections available, accessible, and discoverable and creation of a Policy Management Framework.	Director General Policy	March 31, 2012

Recommendation	Action	Responsibility	Deadline
7. The Resource Discovery Sector should integrate the use of quality assurance mechanisms within its sector to monitor the application of policies and standards and ensure early detection of significant issues.	Undertake environmental scan of current quality assurance mechanisms and gaps.	Director General Services	2012-2013

APPENDIX B – RISK RANKING OF RECOMMENDATIONS

The following table presents the recommendations and assigns risk rankings of high, medium or low. Risk rankings were determined based on the relative priorities of the recommendations and the extent to which the recommendations indicate non-compliance with the *Library and Archives of Canada Act* and the Treasury Board secretariat of Canada policies.

Recommendations	Risk Level
1. The Resource Discovery Sector should complete the development of its global access strategy designed to respect the intent of the LAC legislation and to meet the current and future needs of Canadians. This strategy should be supported by an appropriate governance structure and by an Implementation Plan that will clearly set accountabilities and timeframe.	High
2. The Resource Discovery Sector should finalize and approve its organizational structure to reflect the access strategy under development and implement an integrated planning process to ensure that responsibility for results is clearly assigned and to promote accountability.	High
3. The Resource Discovery Sector should develop new instruments to identify the needs and interests of the current and future Canadian population.	Medium
4. The Resource Discovery Sector should integrate the results of client surveys and consultation processes into the planning process.	Medium
5. The Resource Discovery Sector should adopt and implement a formal and consistent risk management approach. This approach should seek the involvement of other corporate sectors when warranted.	Medium
6. The Resource Discovery Sector should develop internal controls commensurate with identified strategic and operational risks and monitor results. Priority should be given to the development and implementation of policies and procedures.	Medium
7. The Resource Discovery Sector should integrate the use of quality assurance mechanisms within its sector to monitor the application of policies and standards and ensure early detection of significant issues.	Low