Canada's Nuclear Regulator

Audit of Information Management

Office of Audit and Ethics

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Canadian Nuclear Safety Commission
Commission canadienne de sûreté nucléaire
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Table of Contents

Executive Summary

Introduction

An audit of the CNSC's e-Access system[1] was approved by the Audit Committee, in April 2010, as part of the Risk-Based Audit Plan for 2010-2011 to 2012-2013. In the fall of 2010, the Office of the Comptroller General (OCG) invited the CNSC and other departments and agencies to participate in the OCG's Horizontal Audit of Information Management.

The Office of Audit and Ethics (OAE) recommended to the Audit Committee that the CNSC accept the invitation. The Audit Committee decided to replace the audit of e-Access with the audit of Information Management (IM) and participate in the OCG's audit. This report contains the audit findings transmitted to the OCG for the horizontal audit as well as findings for other audit work done specifically for the CNSC.

The management of information at the CNSC is governed by multiple acts of Parliament, along with central agency policies, directives and standards. These range from instruments that address specific areas of IM and information technology (IT), to the broader Treasury Board Secretariat (TBS) Policy on Information Management. Furthermore, as a court of record, the CNSC has obligations under the *Nuclear Safety and Control Act* (NSCA) to retain certain documents for a defined period of time.

Objective

The objective of this audit was to provide assurance to the President, Senior Management and the Audit Committee that the governance, capacity, information architecture, tools and service delivery over information management are in place to provide relevant and timely information that is accessible to support decision-making.

Scope

For purposes of the audit, the definition of information management is recordkeeping plans and practices surrounding **unstructured data**. Unstructured data is paper-based and electronic-based information that includes working documents such as inspection reports, tracking reports, records of decision, work planned for licensees, as well as project plans, spreadsheets and emails.

Approach

The audit approach focused on reviewing the CNSC's IM structure, policies and procedures and usage of the corporate repository for document retention.

[1] The CNSC's document management system, a corporate repository for the documents and records that have business value for the CNSC.

The audit methodology consisted of:

- identifying and assessing key risks associated with the IM control framework
- conducting interviews with managers and staff
- reviewing documentation relevant to IM, including legislation, regulations, policies and processes, procedures and documented controls
- conducting tests to determine awareness of the Policy

The audit fieldwork was conducted between February 1 and May 31, 2011. The findings and conclusion are based on conditions that existed as of May 31, 2011 against the pre-established audit criteria.

This audit was conducted within the established parameters of the Treasury Board Secretariat's Policy on Internal Audit as well as the prescribed standards of the Institute of Internal Auditors.

Overall Conclusions

The audit assessed and concluded that the governance, capacity, information architecture, tools and service delivery over information management are in place to provide relevant and timely information that is accessible to support decision-making. Strengths as well as areas for improvement were identified.

In terms of strengths, the audit found that the CNSC Information Management Policy (IM Policy) establishes the requirements that records of business value must be retained. The CNSC has established formal processes and procedures for the protection of information assets, and the roles and responsibilities of managers, employees and IM functional experts are clearly defined.

The audit also found there were areas for improvement, identifying needs such as to better communicate performance metrics for IM activities to the business lines, increase IM-related objectives in the employees' performance-management process, and improve tools for the disposal and archiving of documents.

Recommendations to address the areas of improvement noted above are included in the audit report.

1. Introduction

1.1 Background

An audit of the CNSC's e-Access system was approved by the Audit Committee in April 2010, as part of the Risk-Based Audit Plan for 2010-2011 to 2012-2013. In the fall of 2010, the Office of the Comptroller General (OCG) invited the CNSC and other departments and agencies to participate in the OCG's Horizontal Audit of Information Management.

The Office of Audit and Ethics (OAE) recommended to the Audit Committee that the CNSC accept the invitation. The Audit Committee decided to replace the audit of e-Access with the audit of Information Management and participate in the OCG's audit.

Information is a strategic business resource within the Government of Canada. Effective information management (IM) makes program and service delivery more efficient, supports transparency, enables collaboration across organizations, supports informed decision-making in government operations, protects government's information assets, and preserves information of historic or enduring value for the benefit of present and future generations. The focus of IM is on information as a critical resource, regardless of its source or format.

The management of information at the CNSC is governed by multiple acts of Parliament, along with central agency policies, directives and standards. These range from instruments that address specific areas of IM and information technology (IT), to the broader Treasury Board Secretariat (TBS) Policy on Information Management. Furthermore, as a court of record, the CNSC has obligations under the *Nuclear Safety and Control Act* (NSCA) to retain certain documents for a defined period of time.

The CNSC IM/IT Policy Framework provides direction on all disciplines of IM at the CNSC. Where possible, the CNSC adopts existing central agency policy, adapting it as required, to reflect the specific details of the CNSC environment.

IM is organized under the overall leadership of the Director General and Chief Information Officer (CIO), Information Management and Technology Directorate, Corporate Services Branch (CSB).

The audit was premised on the basis that the creation, maintenance and accessibility of electronic records are essential to the efficient and effective implementation of regulatory program activities.

The audit period was from February 1 to May 31, 2011. The audit examined conditions at the time of the audit. However, testing of the training offered to new hires was performed from April 1, 2010 to March 31, 2011.

1.2 Objective and Scope

The objective of this audit was to provide assurance to the President, Senior Management and the Audit Committee that the governance, capacity, information architecture, tools and service delivery over information management are in place to provide relevant and timely information that is accessible to support decision-making.

For purposes of the audit, the definition of IM is recordkeeping plans and practices surrounding **unstructured data**. Unstructured data is paper-based and electronic-based information that includes working documents such as inspection reports, tracking reports, records of decision, work planned for licensees, as well as project plans, spreadsheets and emails.

1.3 Analysis of Risks

The OAE audit team undertook a risk assessment to determine the audit criteria that would be used for the examination phase of the audit. The following key risks were identified.

Policy and Governance The risk that a governance structure has not been put into place to support the CNSC's need for the management of information.
People and Capacity The risk that the CNSC has not developed a highly skilled workforce and that resources are not sufficient to meet the needs for managing information.
Controls and Processes The risk that operational areas of the CNSC have not made IM a priority in how they do business, or aligned themselves with the IM strategy of the CNSC, such as the use of the corporate repository for documents of business value (e-Access).
Information Tools and Systems Infrastructure The risk that information tools are not developed, implemented or supported, and that users do not use the tools provided for the management of information.
Recordkeeping The risk that records and information are not properly disposed of or archived in accordance with the Library and Archives Canada (LAC) Multi-Institutional Disposition Authorities (MIDAs), CNSC Information Security Directive and CNSC IM Policy.

1.4 Audit Criteria

Based on the risk assessment, the OCG developed the following audit criteria. The audit criteria were based on the Government of Canada IM Strategy, Treasury Board Directive on Recordkeeping, Treasury Board Policy on Information Management and CNSC IM Policy.

Policy and Governance – The CNSC has a governance structure in place to effectively support an IM strategy and IM outcomes.

People and Capacity – The CNSC is developing a highly skilled workforce to ensure that capacity exists to deliver IM outcomes.

Enterprise Information Architecture – Departments and agencies are developing information architecture and processes that respect their IM risks and controls, and operational requirements.

Information Management Tools and Applications – IM tools are developed and implemented that respect appropriate control requirements of the department and of the business users, and are compliant with the information architecture within and across departments.

Information Management Service Delivery – Recordkeeping practices ensure that information is timely, accurate, and accessible for departments in the delivery of Government of Canada programs and services.

Detailed audit criteria are included in appendix A.

1.5 Approach and Methodology

The audit approach focused on reviewing the CNSC's IM structure, policies and procedures and usage of the corporate repository for document retention.

The audit methodology consisted of:

- identifying and assessing key risks associated with the IM control framework
- conducting interviews with the users to determine their level of awareness and use of the CNSC IM Policy; a sample of 21 managers and employees across CNSC directorates were interviewed
- reviewing documentation relevant to IM, including legislation, regulations, policies and processes, procedures and documented controls
- conducting tests to determine if new CNSC employees hired from April 1, 2010 to March 31, 2011 were provided e-Access training by IMTD, as required under the IM Policy

- conducting tests on the CNSC's disposition activities to determine if disposition was being performed as required for the period of February 1 to May 31, 2011

The audit fieldwork was conducted between February 1 and May 31, 2011. The findings and conclusion are based on conditions that existed as of May 31, 2011 against pre-established audit criteria.

This audit was conducted within the established parameters of the Treasury Board Secretariat's Policy on Internal Audit as well as the prescribed standards of the Institute of Internal Auditors.

1.6 Statement of Assurance

Sufficient and appropriate audit procedures have been conducted and evidence gathered to support the accuracy of the findings and conclusions in this report and to provide an audit level of assurance. The findings and conclusions are based on a comparison of the conditions, as they existed at the time, against pre-established audit criteria that were agreed on with management. The findings and conclusion are only applicable to the entity examined and for the scope and time period covered by the audit.

2. Observations and Recommendations

2.1 Policy and Governance

Treasury Board policy requires that departments have governance structures, mechanisms and resources in place to ensure the continuous and effective management of information.

The audit found that the roles and responsibilities of managers, employees and IM functional experts are clearly defined in the CNSC IM Policy. IM/IT governance flows from the President and CNSC Management Committee (MC), supported by the IM/IT Management Committee (IM/IT MC), which in turn is supported by various working groups and technical committees.

The CNSC Management Committee is the approval body for all IM-related activities while the IM/IT MC provides business direction and recommendations to the CNSC MC regarding IM/IT policies, plans, initiatives, priorities and investment decisions.

The IM/IT Management Committee ensures that the IM/IT Plan is aligned with CNSC priorities, CNSC business strategic plans, the IM/IT Strategic Plan, Government of Canada direction for IM/IT, legal and policy framework, and industry best practices.

The IM function is part of the Information Management and Technology Directorate (IMTD), Corporate Services Branch. The CNSC IM champion is the Chief Information Officer (CIO) and Director General, IMTD.

The CIO reports regularly to the IM/IT MC and CNSC MC on planned IM projects, and includes updates on progress, budget and scheduled activities. Updates on other completed tasks related to planned IM activities are provided as well.

The IM/IT Plan 2009-10 focuses on how the IMTD will support the Management Committee vision for IM/IT. The plan includes: the governance framework for IM/IT in the CNSC and detailed information on the mandate, vision, principles and objectives, initiatives with outcomes, priorities, resource requirements, governance, measures of success, performance measures and work plan for IMTD.

Although regular monitoring of the IM activities takes place, performance metrics for IM activities are not communicated to the business lines. Management has indicated that the IM/IT Strategic Plan 2011-2013 that was presented to the CNSC MC in June 2011 will address this issue.

The Government of Canada (GC) IM Strategy requires departments to participate in the setting of government-wide direction of information and recordkeeping. This includes participation in GC IM committees and in the development and implementation of government-wide policy.

The audit found that the CNSC uses the GC's endorsed electronic document and records management solution, known as Records Document Information Management

System (RDIMS). This solution uses the legacy e-Docs solution, branded at the CNSC as e-Access.

IMTD IM professionals are active in various government-wide initiatives including committees and working groups, as well as GCPEDIA initiatives.

The CNSC managers and employees interviewed indicated that they are familiar with the CNSC IM Policy and apply the policy in their daily activities. The majority of the interviewees were aware of their roles and responsibilities with respect to IM.

The CNSC IM Policy requires managers to ensure employees understand and apply effective IM in their daily activities and that these responsibilities should be included in the employees' performance objectives. However, we found that a formal performance management process that would support managers in fulfilling this responsibility was not in place at the time of the audit.

Recommendations

1. The CIO should communicate performance metrics for the management of information to the business lines.

2. The Vice-President of the CSB, in consultation with the CNSC MC, should ensure that, when the performance management process evolves to include all staff, the IM Policy requirement is included in employees' performance objectives.

Management Response and Action Plan

1. The IMTD produces reports twice a year on the use of e-Access, using the built-in reporting tool. These reports provide information such as the total number of documents entered into the system, usage of e-Access by branch/directorate, and number of documents entered by the Records Office on behalf of end users.

   The Records Office keeps detailed statistics on all its day-to-day operations (associated with the management of both paper and electronic records). This includes detailed metrics on the volume of correspondence received, scanned, classified, routed and filed.

   The reports are reviewed by the CIO and IMTD management team for monitoring and decision-making and, where required, are used for follow-up with specific directorates and users.

   As this performance metrics data is readily available, IMTD will look for additional opportunities to communicate trends and findings across the organization, beginning with the IM/IT User Group, and with inclusion of these metrics in the IMTD Annual Report.

A recent survey of CSB services will provide additional qualitative feedback on IM services, which will supplement the quantitative performance metrics data currently available.

2. In coordination with the rollout of performance management across the CNSC, the IMTD will develop and communicate potential IM performance/learning objectives for staff.

Actions

- The IMTD will communicate performance metrics on the use of e-Access and Records Office support through the IM/IT User Group and through the IMTD Annual Report.
  Target date: ongoing annually (Annual Report); IM/IT User Group – twice per year, starting in September 2011.

- In coordination with the rollout of performance management across the CNSC, the IMTD will develop and communicate potential IM performance/learning objectives for staff.
  Target date: TBD (subject to dates for rollout of performance management across the CNSC).

2.2 People and Capacity

The Government of Canada Information Management Strategy identifies the need to develop a highly skilled workforce to ensure that capacity exists to deliver IM outcomes.

There is an expectation that resources and implementation of departmental IM activities are coordinated, including the training and development of staff and the building of awareness so that IM resource and training requirements are identified, addressed and monitored.

The audit found that the CNSC IM function is currently staffed with experienced IM functional experts. IM staff members are encouraged to take professional development training in IM. They regularly attend local workshops and conferences offered by Library and Archives Canada, the Chief Information Officer Branch of the TBS, and other professional organizations.

The audit found that the IMTD provides new employees an online orientation through BORIS and a “Welcome” binder containing key information. All aspects of managing information are included in these materials, including an overview of key IM Policy instruments, practical advice on recordkeeping, and transporting and transmitting sensitive information. This training is offered in most cases to new employees very shortly after their first day of work.

IM functional specialists, including Access to Information and Privacy (ATIP) staff, provide awareness sessions throughout the year on a variety of IM and ATIP topics, including: information security, access to information, and recordkeeping.

The IM Services site on BORIS provides information for all CNSC employees on all aspects of managing information including document and records management, information security, access to information, privacy and IM services such as the CNSC Library and Records Office.

The IMTD provides advice, training and awareness sessions to employees at all levels. Training on IM and the use of e-Access is mandatory for all new employees to access their e-Access account. The Management Fundamentals training program, which is mandatory for all managers, contains a module on IM. Advanced one-on-one training in the use of e-Access is available on demand to all employees.

Recommendations

No opportunities for improvement were identified in this area.

2.3 Enterprise Information Architecture

The Government of Canada Policy on Information Management requires departments to develop an information architecture and processes that ensure information and records are identified and managed as valuable assets to support the outcomes of programs and services, as well as operational needs and accountabilities. This includes the identification and protection of information resources of business to enable or support the departments' legislated mandate.

Departments are expected to identify, establish, implement and maintain repositories in which information resources of business value are stored or preserved in a physical or electronic storage space.

The audit found that the CNSC has developed and implemented a functional Information Classification System (ICS) that applies to all CNSC business records regardless of format. The key repository for storing electronic files/records is the e-Access system, which is organized in accordance with the ICS.

The CNSC has established formal processes and procedures for the protection of information assets. The e-Access system provides access control over documents stored therein to individual users, groups of users or both.

The CNSC IM Policy establishes the requirement that records of business value must be retained. The determination is made by the business owner with the advice and assistance provided by the IM group.

All users who were interviewed use e-Access to manage some or all of the business records, and 18 of the 21 users interviewed stated that emails of business value were saved in e-Access.

We found that some business areas had established a standard shared folder structure and standard file-naming convention to facilitate the management of documents. All users interviewed used the access rights function in e-Access to ensure information privacy and security requirements for documents stored in e-Access are met.

The CNSC has declared in its IM Policy: "Electronic systems are the preferred means of creating, using and managing information at the CNSC. Electronic documents and data records will form the official CNSC record, with other formats used for reference only. Paper will be used only for reference and when required for specific business, legal or policy considerations."

Unstructured information is stored primarily in e-Access, which is used across the organization. Some hard copy records are stored in the business area where they are used (Finance, HR, etc.), but these records are included in the architecture and processes of the CNSC.

All paper records are routed through the corporate Records Office for profiling and filing. Profiles are recorded in the Integrated Record Information Management System (IRIMS) and integrated into e-Access.

While the CNSC has put in place the requisite system and structures to make relevant, reliable, timely and comprehensive information available to employees, management cannot be assured that emails of value are properly stored.

Recommendations

3. The CIO should:

- ensure that managers are provided with the information and support needed to ensure their employees are using e-Access to store emails of business value

- develop a process for monitoring and reporting on the use of e-Access by users for the storage of emails of business value

Management Response and Action Plan

- The Management Fundamentals course (IM Module) provides managers with information on how to identify emails of business value, and emphasizes that it is the manager's responsibility to convey these policy requirements to his/her team. During the training, managers are referred to BORIS guidance materials for further information, as well as contact information for IMTD specialists who can guide and assist managers and staff on an ongoing basis.

  As part of the activities required for compliance with the Directive on Recordkeeping, the IMTD will be leading a CNSC-wide exercise to develop an inventory of records of business value, along with associated official repositories. This central agency-mandated exercise, which will take place in FY 2011-2012 and 2012-2013, will provide the IMTD with an additional opportunity to identify the types of emails that have business value and to communicate this guidance to managers and staff.

  The IMTD provides ongoing training and awareness on IM (including email management) through the CNSC Orientation Module (available on BORIS), the

IM/IT site on BORIS, articles in *Synergy*, and through ad hoc sessions as requested by managers or staff.

The IMTD is in the process of updating its content on BORIS and, in doing so, will ensure that guidance on managing email is updated and organized in an accessible way for users.

- As indicated in section 2.1, the IMTD produces reports twice a year on usage of e-Access by individual users, including specific information on the type and number of records submitted by each user or business unit (including, specifically, the number of emails). Through this report, the IMTD can identify which individuals or business units are or are not saving emails in e-Access.

  Although it is the responsibility of the content owner to identify whether a record (including email) has business value, the IMTD does do sampling reviews of records entered in e-Access as part of its records management quality assurance processes. These QA processes often identify where there is a need to follow up with specific users or divisions to clarify policies and provide additional guidance on which emails should be saved in the repository.

Actions

- Work with business lines to identify records of business value (including emails), as planned through the Directive on Recordkeeping Implementation Project.
  Target completion: end of FY 2012-2013 (in order to meet the TBS requirement to implement the Directive on Recordkeeping by April 2014).

- Refresh email management guidance on BORIS, available through the IM/IT section on BORIS, and communicate the availability of this guidance to staff and managers.
  Target completion: January 2012.

2.4 Information Management Tools and Applications

The Government of Canada IM Strategy requires that IM tools are developed and implemented that respect appropriate control requirements of the department and of the business users, and that are compliant with the information architecture within and across departments.

As well, there is an expectation that key methodologies, mechanisms and tools are established and implemented to support the departmental recordkeeping requirements and business user needs throughout the information lifecycle.

As mentioned previously, the CNSC has adopted the Government of Canada's endorsed electronic document and records management solution, known as RDIMS (e-Access), as its corporate tool for managing unstructured information. This tool is

deployed on every desktop with the information in e-Access searchable by those who have appropriate rights to do so.

The CNSC also uses a commercial off-the-shelf records management solution (IRIMS) for paper files. It is used for file management, retention and disposition of paper records and is integrated into e-Access.

Users interviewed have expressed challenges with the search function in e-Access that results in diminished effectiveness of the tool (for example, lack of document naming convention, multiple copies of the same document, productive time spent searching for documents).

Recommendation

4. The CIO, in consultation with CNSC managers, should continue to build on the strengths already established and identify existing gaps in supporting the business areas in their ongoing improvement and evolution of IM (for example, adoption of a common approach by each business line for naming of documents). This process could identify common issues or challenges in using e-Access, as well as best practices to improve the use of the IM tool.

The IMTD has two full-time equivalent positions (Document Management (DM) Officers) that have a key responsibility for training and liaison with business users, in order to provide IM support, advice and guidance (such as training on e-Access and developing/documenting standard processes for document handling). Through the Management Fundamentals training, managers are made aware that these resources are available, upon request, to assist their divisions. The DM Officers meet regularly with divisions to clarify policy and procedural questions and provide services in documenting and improving information and record-handling processes.

The DM Officers also organize annual group sessions with all CNSC administrative assistants to discuss process-related questions and issues and identify collective areas of concern/improvement in document processing and handling. Issues with supporting IT systems (e-Access, CCM Mercury, etc.) that are identified through these meetings are brought back to IMTD to be addressed as ongoing systems improvements.

Actions

- Provide additional communication to managers and staff (through BORIS, the Managers' Forum, and the IM/IT User Group) that IMTD staff is available, on an ongoing basis, to provide training and assistance on IM tools, services and processes.
  Target completion: ongoing activity.

- Continue to iterate, through the Management Fundamentals and other venues, that it is the responsibility of managers to identify IM challenges within their area, and to contact IMTD for support and guidance.
  Target completion: ongoing activity.

2.5 Information Management service delivery

A key requirement of the Policy on Information Management is for recordkeeping practices to ensure that information is timely, accurate, and accessible for departments in the delivery of Government of Canada programs and services.

The TBS Directive on Recordkeeping further requires that departments establish, implement and maintain retention periods for information resources of business value, develop and implement a documented disposition process for all information resources and perform regular disposition activities for all information resources.

The audit found that the CNSC has a Library and Archives Canada (LAC) approved Disposition Authority for its operational records with retention periods and disposal processes.

The CNSC applies the LAC Multi-Institutional Disposition Authorities (MIDAs) to its administrative records such as records found in Finance, Administration and Human Resources. The MIDAs relate to records managed by all or a multiple number of government institutions and allow the institutions to dispose of records under established terms and conditions.

The audit found that a standard process is in place for disposing of corporate paper business records. This process is controlled by IMTD which works closely with business owners to ensure they are aware of the process and that it is respected.

Corporate administrative paper records which may be stored in the work area of the owners (Finance, Administration, and HR) are also managed by IMTD in accordance with the CNSC IM Policy.

However, records stored electronically in e-Access are not being disposed of at this time in accordance with approved CNSC disposal authorities. The current version of the e-Access system does not have the capability to dispose of electronic records. Due to the current limitation of e-Access for disposing and archiving of electronic documents stored in e-Access, a solution should be implemented.

Treasury Board directives require departments to integrate IM requirements into development, implementation, evaluation and reporting activities of departmental programs and services.

The audit found that IM requirements are addressed during departmental strategic planning and during the planning phase of departmental program and system design. Business sectors analyze the business processes and convey information requirements to IM functional specialists. Recordkeeping practices are used to ensure transparency and accountability of government programs and services.

The Report on Plans and Priorities 2010–2011 includes references to key IM activities of the CNSC. IM requirements are included in the IM/IT Plan 2009-2010.

The IM/IT Plan 2009-2010 is the culmination of processes designed to collect information regarding IM needs from all sectors of the organization. Through the established user groups, working groups and the IM/IT MC, the needs of users and business lines are identified, prioritized and, where appropriate, included in the Plan.

The CIO provides regular updates on the implementation of the IM/IT Plan 2009-2010 to the IM/IT MC and the CNSC MC. The IM/IT Strategic Plan 2011-2013, which was presented to the CNSC MC in June 2011, will replace this plan.

The centralized IM/IT function is involved in all aspects of the business operations of the CNSC. This includes IM/IT planning, project management, system development, IM, etc.

Recommendation

5. The CIO should implement a solution to address the current limitation of e-Access for disposing of and archiving electronic documents stored in e-Access.

Management Response and Action Plan

The IMTD is in the planning phase of the project to implement the Directive on Recordkeeping (central agency-mandated requirement to be compliant by 2014). The Directive on Recordkeeping project has been put forward as an IM/IT priority, requiring CNSC approval and funding for FY 2011-2012 and FY 2012-2013.

The requirement to implement electronic records disposition, both in e-Access and in other data systems of record, has been identified as one of the main activities within this project and will be addressed as part of the project's execution.

As part of the IM/IT Strategic Plan, the IMTD has identified the need to upgrade e-Access to Livelink ECM, the current approved GC solution for content management. This solution offers integrated archiving within the system. Full archiving capability will be implemented as part of this initiative once it is approved and once interdependencies with other systems and upgrades have been addressed.

Given the technical complexities and long-term investments associated with digital archiving and long-term preservation, the CNSC must coordinate its activities in this area with those of the broader GC community. The IMTD continues to participate in discussions and planning at the GC-wide level on the topic of long-term preservation and archiving of government records with permanent historical value.

Actions

- Continue to implement the Directive on Recordkeeping project, as approved by the Management Committee. Specifically, through this initiative, the IMTD will implement the functionality required for disposition scheduling and records disposition in e-Access.

Target completion: end of FY 2012-2013, subject to approval and funding of the IM/IT investment plan. TBS requires all departments and agencies to implement the Directive on Recordkeeping by April 2014.

- As part of a broader multi-year strategic planning exercise, plan the upgrade from e-DOCS 5.1.5 to Livelink, in order to take advantage of integrated functionality such as archiving, collaboration, and workflow.
  Target completion: TBD (subject to approval and funding of multi-year IM/IT investment plan).

- Continue to participate in interdepartmental forums and working groups aimed at establishing a GC-wide approach to archiving, long-term formats, and preservation of electronic records.
  Target completion: ongoing activity.

3. Conclusion

The audit concluded that the governance, capacity, information architecture, tools and service delivery over IM are in place to provide relevant and timely information that is accessible to support decision-making.

Specifically, the audit found the following:

- The CNSC has the governance structures in place to effectively support an IM strategy and IM outcomes, including an informal performance measurement framework. However, there was no formal employee performance objective mechanism that would allow IM to be included as per the CNSC IM Policy requirement.

- The CNSC is developing a highly skilled workforce to ensure that the capacity exists to deliver IM outcomes and is currently staffed with experienced IM functional specialists.

- The CNSC has developed an information architecture and processes by having a corporate repository for storing electronic documents (e-Access) and an information classification structure and by providing information and training to all employees. To ensure the effective use of the information architecture, a monitoring and reporting process for the storage of emails is required.

- The CNSC has IM tools that respect appropriate control requirements of the CNSC and business users. The CNSC has some gaps in the use of the e-Access tool by business lines.

- The CNSC recordkeeping practices ensure that information is timely, accurate and accessible for departments in the delivery of CNSC programs and services. However, at this time, e-Access has limitations for disposition and archiving processes.

Appendix A – Detailed Audit Criteria

1.0 Policy and Governance **The CNSC has a governance structure in place to effectively support an IM strategy and IM outcomes.**	1.1 Governance structures, mechanisms and resources are in place to ensure the continuous and effective management of information. (Policy on Information Management, 5.2.3)
	1.2 Monitoring and reporting processes are in place for information management. (Policy on Information Management, 6.2)
	1.3 Departments participate in setting government-wide direction for information and recordkeeping. (Policy on Information Management 6.1.6; Government of Canada IM Strategy – Strategic Goal #3, Strategic Outcome #4)
	1.4 The CNSC users comply with the CNSC IM Policy.
2.0 People and Capacity **The CNSC is developing a highly skilled workforce to ensure that capacity exists to deliver IM outcomes.**	2.1 Departments have a common body of knowledge, learning and assessment tools. (Government of Canada IM Strategy – Strategic Goal #2, Strategic Outcome #1)
	2.2 Departments have a common understanding of common policy instruments and assessment tools. (Government of Canada IM Strategy – Strategic Goal #2, Strategic Outcome #2)

3.0 Enterprise Information Architecture **Departments are developing information architecture and processes that respect their IM risks and controls, and operational requirements.**	3.1 Information and records are identified and managed as valuable assets to support the outcomes of programs and services, as well as operational needs and accountabilities. (Policy on Information Management, 5.2.2)
	3.2 Government programs and services provide convenient access to relevant, reliable, comprehensive and timely information. (Policy on Information Management, 5.2.1)
4.0 Information Management tools and applications **IM tools are developed and implemented that respect appropriate control requirements of the department and of the business users and that are compliant with the information architecture within and across departments.**	4.1 Departments develop and implement common and enterprise-wide tools and applications. (Government of Canada IM Strategy – Strategic Goal #4, Strategic Outcome #1)
5.0 Information Management service delivery **Recordkeeping practices ensure that information is timely, accurate and accessible for departments in the delivery of Government of**	5.1 All information is managed to ensure the relevance, authenticity, quality and cost-effectiveness of the information for as long as it is required to meet operational needs and accountabilities. (Policy on Information Management, 6.1.4)
	5.2 Departmental programs and services integrate IM requirements into development,

Canada programs and services.	implementation, evaluation and reporting activities. (Policy on Information Management, 6.1.1; *Government of Canada IM Strategy* – Strategic Goal #3, Strategic Outcome #1)

Appendix B – Overview of Audit Recommendations and Management Action Plans

Recommendations

1. The CIO should communicate performance metrics for the management of information to the business lines.

2. The VP of CSB, in consultation with the CNSC MC, should ensure that, when the performance management process evolves to include all staff, the IM Policy requirement is included in employees' performance objectives.

Unit Responsible	Management Response	Timeline
IMTD-CIO VP-CSB	1. The IMTD produces reports twice a year on the use of e-Access, using the built-in reporting tool. These reports provide information such as the total number of documents entered into the system, usage of e-Access by branch/directorate, and number of documents entered by the Records Office on behalf of end users. The Records Office keeps detailed statistics on all its day-to-day operations (associated with the management of both paper and electronic records). This includes detailed metrics on the volume of correspondence received, scanned, classified, routed and filed. The reports are reviewed by the CIO and IMTD management team for monitoring and decision-making and, where required, are used for follow-up with specific directorates and users. As this performance metrics data is readily available, IMTD will look for additional opportunities to communicate trends and findings across the organization, beginning with the IM/IT User Group, and with inclusion of these metrics in the IMTD Annual Report.	

	A recent survey of CSB services will provide additional qualitative feedback on IM services, which will supplement the quantitative performance metrics data currently available. 2. In coordination with the rollout of performance management across the CNSC, the IMTD will develop and communicate potential IM performance/learning objectives for staff. **Actions** • The IMTD will communicate performance metrics on the use of e-Access and Records Office support through the IM/IT User Group and the IMTD Annual Report. • In coordination with the rollout of performance management across the CNSC, the IMTD will develop and communicate potential IM performance/learning objectives for staff: ► Development of IM performance/learning objectives for staff. ► Summary from the Human Resources Directorate (HRD) on timelines for rolling out performance management across the CNSC.	**Completed** **October 2011** **December 2011**

Recommendation

3. The CIO should:

- Ensure that managers are provided with the information and support needed to ensure their employees are using e-Access to store emails of business value
- Develop a process for monitoring and reporting on the use of e-Access by users for the storage of emails of business value

Unit Responsible	Management Response	Timeline
IMTD-CIO	1. The Management Fundamentals course (IM Module) provides managers with information on how to identify emails of business value and emphasizes that it is the manager's responsibility to convey these policy requirements to his/her team. During the training, managers are referred to BORIS guidance materials for further information, as well as contact information for IMTD specialists who can provide ongoing guidance and assistance to managers and staff. As part of the activities required for compliance with the Directive on Recordkeeping, the IMTD will be leading a CNSC-wide exercise to develop an inventory of records of business value, along with associated official repositories. This central-agency-mandated exercise, which will take place in FY 2011-2012 and 2012-2013, will provide the IMTD with an additional opportunity to identify the types of emails that have business value, and to communicate this guidance to managers and staff. The IMTD provides ongoing training and awareness on IM (including email	

	management) through the CNSC Orientation Module (available on BORIS), the IM/IT site on BORIS, articles in *Synergy*, and through ad hoc sessions as requested by managers or staff. The IMTD is in the process of updating its content on BORIS and, in doing so, will ensure that guidance on managing email is updated and organized in an accessible way for users. 2. As indicated in section 2.1, the IMTD produces reports twice a year on the usage of e-Access by individual users, including specific information on the type and number of records submitted by each user or business unit (including, specifically, the number of emails). Through this report, the IMTD can identify which individuals or business units are or are not saving emails in e-Access. Although it is the responsibility of the content owner to identify whether a record (including email) has business value, the IMTD does do sampling reviews of records entered in e-Access as part of its records management quality assurance processes. These QA processes often identify where there is a need to follow up with specific users or divisions to clarify policies and provide additional guidance on which emails should be saved in the repository. **Actions** • Work with business lines to identify records of business value (including emails), as planned through the Directive on Recordkeeping Implementation Project: ► Presentation to Management Committee including detailed timelines and methodology for identification of CNSC records of	**September 2011**

	business value. ► Records of business value identified, documented and validated for the Regulatory Affairs Branch, Corporate Services Branch, Secretariat, Legal Services and President's Office. ► Records of business value identified, documented and validated for the Regulatory Operations Branch and Technical Support Branch. **Note:** timelines for the above will be in accordance with mandatory timelines, milestones and reporting requirements of Library and Archives Canada, for the implementation of the recordkeeping directive. • Refresh email management guidance on BORIS, available through the IM/IT section on BORIS, and communicate the availability of this guidance to staff and managers.	**March 2012** **March 2013** **January 2012**

Recommendation

4. The CIO in consultation with CNSC managers should continue to build on the strengths already established and identify existing gaps in supporting the business areas in their evolution of IM (for example, adoption of a common approach by each business line for naming documents). This process could identify common issues or challenges in using e-Access, as well as best practices to improve the use of the IM tool.

Unit Responsible	Management Response	Timeline
IMTD-CIO	The IMTD has two full-time equivalent positions (Document Management (DM) Officers) that have a key responsibility for training and liaison with business users, in order to provide IM support, advice and guidance (such as training on e-Access and developing/documenting standard processes for document handling). Through the Management Fundamentals training, managers are made aware that these resources are available, upon request, to assist their divisions. The DM Officers meet regularly with divisions to clarify policy and procedural questions and provide services in documenting and improving information and record-handling processes. The DM Officers also organize annual group sessions with all CNSC administrative assistants to discuss process-related questions and issues and to identify collective areas of concern/improvement in document processing and handling. Issues with supporting IT systems (e-Access, CCM Mercury, etc.) that are identified through these meetings are brought back to the IMTD to be addressed as ongoing systems improvements.	

	Actions • Provide additional communication to managers and staff (through BORIS, Managers' Forum, and the IM/IT User Group) that IMTD staff are available, on an ongoing basis, to provide training and assistance on IM tools, services and processes. • Continue to iterate, through the Management Fundamentals and other venues, that it is the responsibility of managers to identify IM challenges within their area and to contact IMTD for support and guidance.	**Completed** **Completed**

Recommendation

5. The CIO should implement a solution to address the current limitation of e-Access for disposing and archiving of electronic documents stored in e-Access.

Unit Responsible	**Management Response**	**Timeline**
IMTD-CIO	The IMTD is in the planning phase of the project to implement the Directive on Recordkeeping (central-agency-mandated requirement to be compliant by 2014). The Directive on Recordkeeping project has been put forward as an IM/IT priority, requiring CNSC approval and funding for 2011-2012 and 2012-2013. The requirement to implement electronic records disposition, both in e-Access and in other data systems of record, has been identified as one of the main activities within this project and will be addressed as part of the project's	

	execution. As part of the IM/IT Strategic Plan, the IMTD has identified the need to upgrade e-Access to Livelink ECM, which is the current approved GC solution for content management. This solution offers integrated archiving within the system. Full archiving capability will be implemented as part of this initiative once it is approved and once interdependencies with other systems and upgrades have been addressed. Given the technical complexities and long-term investments associated with digital archiving and long-term preservation, the CNSC must coordinate its activities in this area with those of the broader GC community. IMTD continues to participate in discussions and planning at the GC-wide level on the topic of long-term preservation and archiving of government records with permanent historical value. **Actions** • Continue to implement the Directive on Recordkeeping project, as approved by the CNSC MC. Specifically, through this initiative, the IMTD will implement the functionality required for disposition scheduling and records disposition in e-Access. ► Provide detailed costs and timelines for the implementation of records disposition in e-Access. These project estimates will be provided to the CNSC MC as a component of regular IM/IT project planning, approvals and reporting processes. ► Implementation of records disposition in e-Access. This target date is subject to the approval and funding of the IM/IT investment plan.	**December 2011** **End of FY 2012-2013**

	► Central-agency compliance with the Recordkeeping Directive. Implementation of records disposition is a component of recordkeeping directive compliance.	**April 2014**
	• As part of a broader multi-year strategic planning exercise, plan the upgrade from e-DOCS 5.1.5 to Livelink, in order to take advantage of integrated functionality such as archiving, collaboration and workflow.	
	► Provide an update to the CNSC MC on long-term plans for migration to Livelink.	**December 2011**
	• Continue to participate in interdepartmental forums and working groups aimed at establishing a GC-wide approach to archiving, long-term formats and preservation of electronic records.	**Completed**

Appendix C – Glossary of Terms

CIO	Chief Information Officer
CSB	Corporate Services Branch
e-Access	The CNSC's document management system, a corporate repository for the documents and records that have business value for the CNSC.
GCPEDIA	Government of Canada Web-based collaborative work tool for federal employees
ICS	Information Classification System
IM	Information Management
IM/IT	Information Management / Information Technology
IM/IT MC	Information Management / Information Technology Management Committee
IMTD	Information Management Technology Directorate
IRIMS	Integrated Record Information Management System
LAC	Library and Archives Canada
MC	CNSC Management Committee
MIDAs	Multi-Institutional Disposition Authorities
NSCA	*Nuclear Safety and Control Act*
OCG	Office of the Comptroller General
RDIMS	Records Document Information Management System