

Data and Information Management: Policies and Procedures to Manage and Protect Data

First Nations Data Governance Strategy (FNDGS)
Summer Knowledge-Sharing Sessions

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Overview

- Introduction to Information Governance and Management
 - Records and Information Management
 - Archives
- Key RIM Program Elements and Considerations
- Importance of Program Documentation
 - Policies, Procedures, Guidelines
- Selected Resources



Key Concepts

Information is a fundamental and valuable asset of every organization

- Needs to be effectively and efficiently managed like other key assets (finances, human resources, infrastructure)

Ongoing staff training, collaboration, and documentation is essential to retaining knowledge within an organization and managing information resources

- Responsibility is not limited to a single department or a particular set of employees

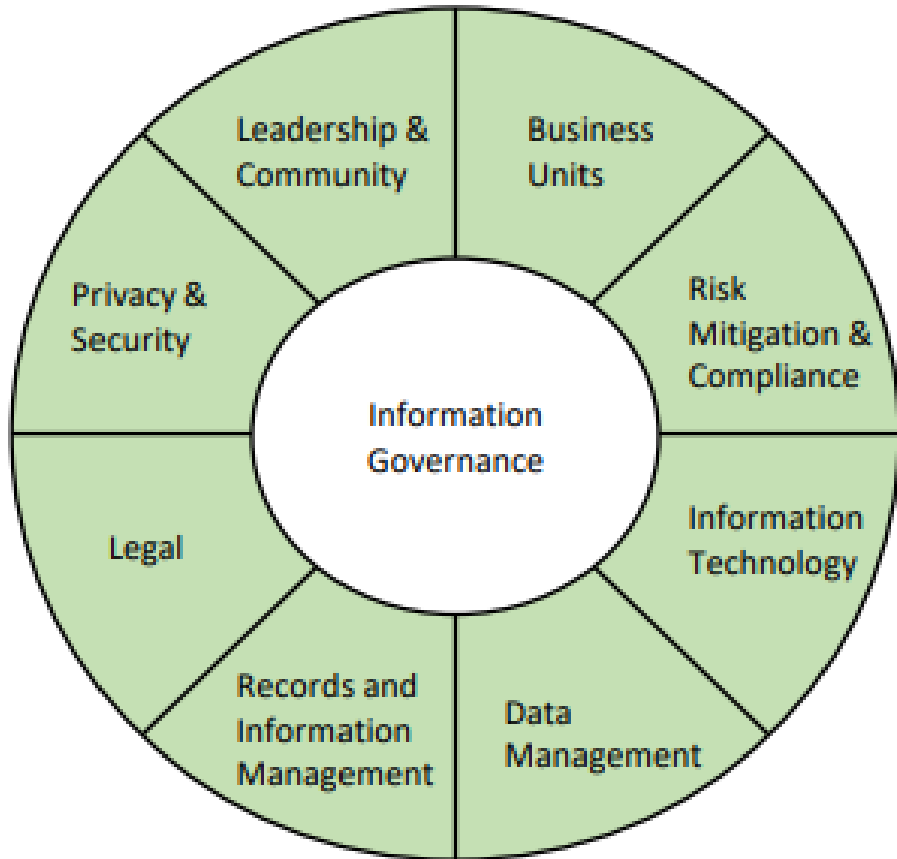
Electronic systems are tools, not “solutions”

- Must be used in conjunction policy, procedures and controls

Data Governance and Management



Data Governance and Information Governance



Data governance is a component of information governance

- Data is a type of information

Your information governance structures will form the foundation for your data governance

- Includes the laws, policies, and decision-making processes that ensure information (including data) is managed properly
- Provides the guidance and oversight function

Source: Data Governance and Management Toolkit
<https://indigenoustat toolkit.ca/>

Key Definitions

- Information Governance
 - Focuses on improving compliance and management of all records and information, both paper and electronic, across the entire organization
 - Agreements, correspondence, email, meeting records, reports, maps, plans, drawings, GIS layers, text messages, photographs, sound recordings, video
- Data Governance
 - Focuses on the collection, management, and use of data sets primarily for reporting and statistical purposes
 - Highly structured information
 - Tables, spreadsheets, relational databases

“Everything is Information”



Information

Content

Documents

Records*

Knowledge*

Data



Unstructured

Structured



*Records serve as evidence of transactions, activities and decisions and can be found in any form

*Knowledge is a type of information typically shared between individuals and can be found in any form

Typical Situations



Principles of RIM

- Involves determining:
 - What records must be kept?
 - to function, carry out responsibilities, and make informed decisions
 - By whom?
 - dedicated roles and responsibilities
 - For how long?
 - short- and long-term
 - Then what happens to them?
 - “keep or toss”

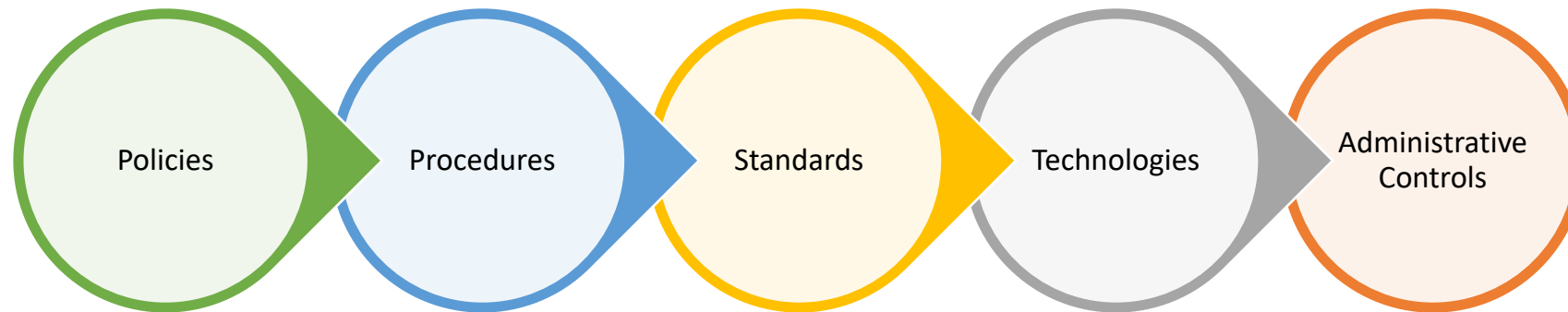


Confusion is easy.

Clarity requires work

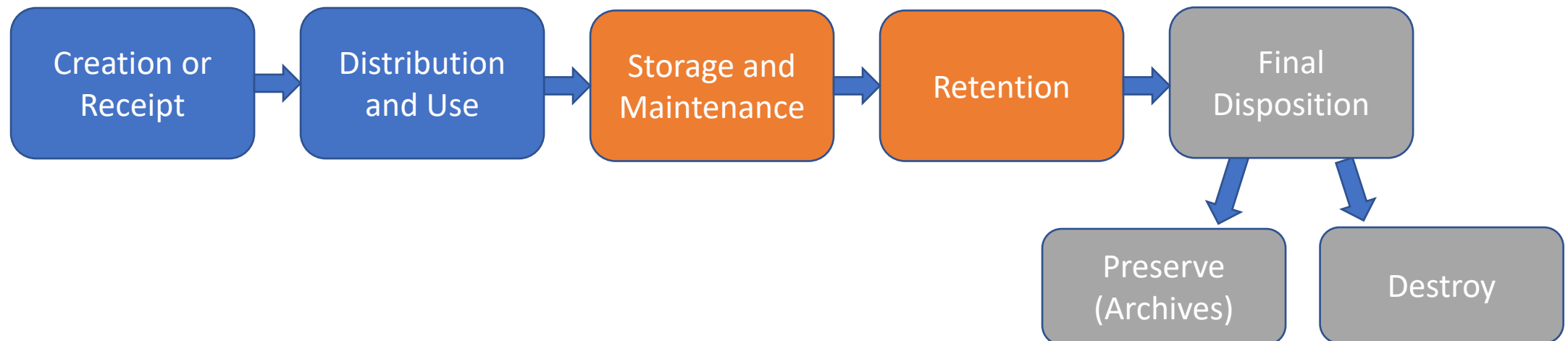
Records and Information Management

- Focuses on the efficient and systematic control of recorded information in all forms and formats throughout the record life cycle
 - Intersects with Archival Science, Information Technology and Legal Services
- Results in a combination of processes, tools and activities



Record Life Cycle

- Based on the idea that records become less important and/or used less often over time
 - **Active**, **Semi-Active**, and **Inactive** records phases
- Begins the moment records are created or received and moves through each stage
 - Need documented processes to support each stage



Purpose of RIM

Improve

- Improve the systematic control of records across the organization
- System is not dependent on the memory of individuals

Improve

- Improve organizational efficiency
 - Reduce amount of time spent locating records
- Reduce costs associated with storage

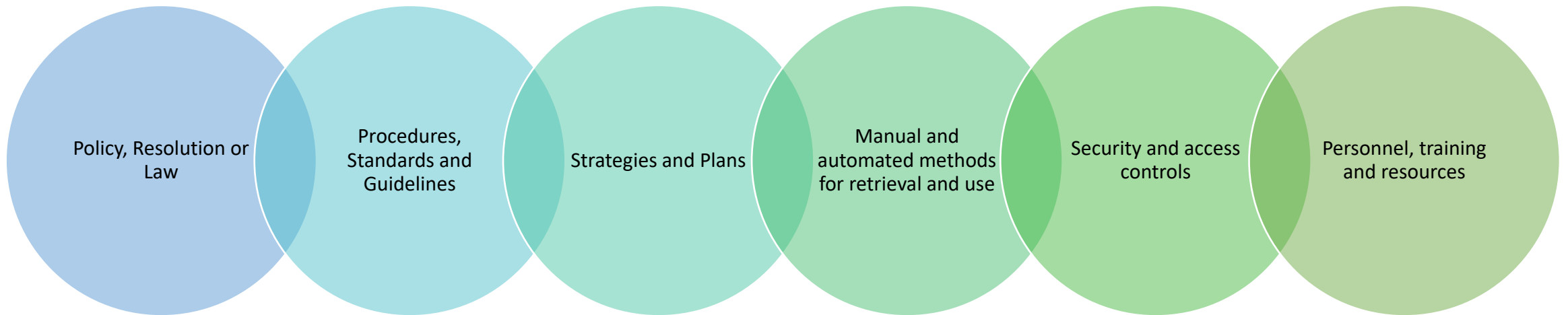
Meet

- Meet governance, legislative and regulatory obligations
 - Fosters accountability, openness and transparency

Protect

- Protect the organization from risk
 - Record life cycle control
 - Secure access to information
 - Retain records only as long as necessary
 - Vital records protection/disaster recovery

RIM Program Elements



RIM Program Design

- Activities include:
 - Assessing business needs and requirements
 - Collaborating with various departments
 - Assigning responsibilities and authorities
 - Developing policies and procedures
 - Planning, implementing, and administering specialized systems for managing records (e.g. databases, electronic document and records management systems)
 - Integrating RIM into business systems and processes (i.e. workflows, system integration)
 - Providing ongoing training and support

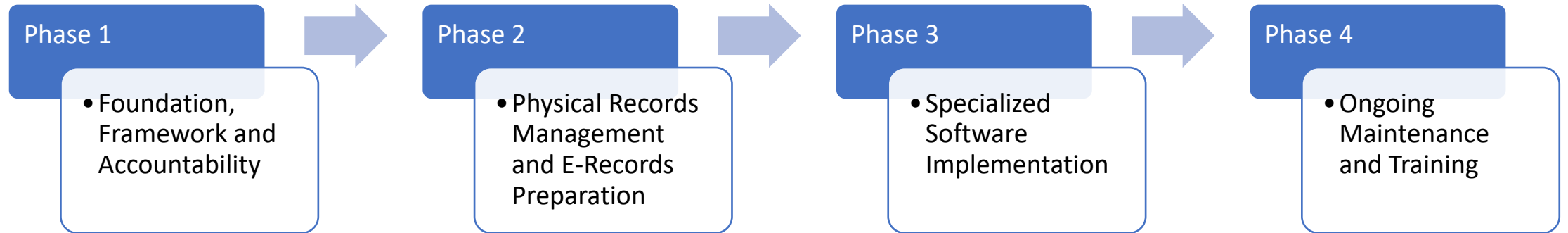


“The Principles” Information Governance Standard

- High-level framework of good IG practice
 - ARMA International
- Describes 8 fundamental attributes or characteristics of effective RIM processes
 - Accountability
 - Transparency
 - Integrity
 - Protection
 - Compliance
 - Availability
 - Retention
 - Disposition

Typical RIM Program Development

- Rate of progress is dependent on multiple factors
 - People, priorities, funding, Leadership support, time available
- Not all organizations will address Phase 3
 - Often where people want to begin



RIM Program Considerations

Must be staffed, maintained and adequately funded

- Ongoing responsibilities such as:
 - Adhering to standards and operating rules
 - Modifying policies and procedures
 - Quality assurance
 - Training (new and existing employees)

Continual “work in progress”

- Dynamic nature of organizations and governments
- Responding to operational program developments
- Responding to ever changing legislative requirements and technology

Program Documentation

- Should act as an “eye witness” to how your RIM Program operates
 - Protects your organization from possible legal action while demonstrating good governance
- Manuals, guidelines, operating standards, etc.
 - Support authorizing policy, resolution or law
 - Must be up-to-date and readily available to staff
- Include step-by-step processes:
 - Using the Records Classification and Retention Schedule
 - Daily Filing Routines
 - Preparing records for storage or destruction

RIM Program Authority

Different mechanisms:

Policy

Resolution

Law



Purpose is to formally
establish the intention of
operational control for
managing recorded
information within an
organization

Sample BCR

**[NAME OF FIRST NATION]
BAND COUNCIL RESOLUTION**

[BCR Number: xxxxxxxx]

WHEREAS section 9 of the *First Nations Fiscal Management Act* (Canada) authorizes the Council of a First Nation to enact laws regarding the financial administration of the First Nation;

WHEREAS the **[Name of First Nation]** enacted the **[Name of First Nation] Financial Administration Law, [Date]**;

WHEREAS section **[X]** of the **[Name of First Nation] Financial Administration Law, [Date]** requires that the Council must establish policies or procedures or give directions respecting the acquisition, management and safeguarding of First Nation assets;

WHEREAS the assets of the **[Name of First Nation]** include financial records, information, information technology and other records (the "Information Assets");

WHEREAS the Council of the **[Name of First Nation]** desires to manage and maintain the Information Assets of the **[Name of First Nation]** in order to comply with the law, reduce risk and for efficient and effective management;

WHEREAS the Council of the **[Name of First Nation]** considers it to be in the best interests of the First Nation to authorize a records and information management policy for such purposes;

THEREFORE BE IT RESOLVED that the **[Name of First Nation]** authorizes and approves of the Records and Information Management Policy, a copy of which is attached to this Band Council Resolution.

A quorum for the **[Name of First Nation]** is **X** Council Members:

Voted in favour: **[Names of each Council Member voting for the Band Council Resolution, titles and signatures]**

Voted against: **[Names of each Council Member voting against the Band Council Resolution, titles and signatures]**

Decision:

Dated:

[NAME OF FIRST NATION] RECORDS AND INFORMATION MANAGEMENT POLICY

Policy Number: xxxxxxxx

Effective Date: [Date]

1. Title

This policy may be cited as the **[Name of First Nation]** Records and Information Management Policy.

2. Interpretation

"Band Manager" means the person designated and authorized to act on behalf of the **[Name of First Nation]** to manage and maintain the records management system;

"Council" means the Council of the First Nation;

"councillor" means a member of the Council of the First Nation and includes the Chief of the First Nation;

"financial records" means all records respecting the financial administration of the First Nation, including the minutes of meetings of the Council and the Finance and Audit Committee;

"record" means anything on which information is recorded or stored by any means whether graphic, electronic, mechanical or otherwise;

"records management system" includes a system used by the **[Name of First Nation]** to manage the records of the **[Name of First Nation]** from record creation through to records disposal and includes any archives program.

3. Records Management System Established

The records management system of the **[Name of First Nation]** is authorized.

4. Compliance With Records Management System

All records created, received, stored, in the custody or control by, or on behalf of the **[Name of First Nation]** by the councillors, officers, employees, committees, contractors, agents, volunteers or members of the **[Name of First Nation]** are the property of the **[Name of First Nation]**. The councillors, officers, employees, committees, contractors, agents, volunteers or members of the **[Name of First Nation]** that create, receive, store, have custody or control of **[Name of First Nation]**'s records must comply with this records management system and this policy. All records of the **[Name of First Nation]** must comply with this records management system and this policy.

5. Band Manager

The Band Manager is responsible for the management and maintenance of the records management system. The Band Manager is authorized to manage and maintain the records management system.

6. Manual Of Procedures And Policy

The Band Manager is authorized to create and maintain a manual of procedures and policy (the "Manual"). Records of the **[Name of First Nation]** are created, accessed, maintained and disposed of only as provided by the Manual.

The Manual must provide for management of the records of the **[Name of First Nation]** and include provisions regarding:

- a) the making, receiving and capturing and organization of records, including records not authorized for creation;
- b) the collection of records (including records not authorized for collection);
- c) access to records;
- d) disclosure of records;
- e) maintenance of records;
- f) managing records;
- g) using records;
- h) converting records into different formats using scanning or other technology;
- i) retention of records;
- j) security of records, including protection;
- k) storage of records;
- l) disposal of records, including destruction, retaining records permanently or having records placed in an archive for permanent preservation; and
- m) any other matter(s) the Band Manager authorizes to be included in the Manual.

7. Integrity And Authenticity Maintained

The records management system must maintain the integrity and authenticity of records made or kept in the usual and ordinary course of business.

8. Authorization To Amend Manual

The Band Manager is authorized to amend the Manual.

9. Compliance With Law

The records management system must comply with the Manual, applicable laws and any provincial, national or international standards adopted for use and contained in the Manual.

Sample RIM Policy

RIM-Related Policies

Data Management Policy

Privacy Policy

Email Management Policy

Social Media Policy

Appropriate Use Policy

Traditional Knowledge Policy

Archives Acquisition Policy

Archives Access Policy

Policies vs. Procedures



Policies

- States what management wants employees to do
- Guiding principle that sets the direction for an organization or department
- Are the rules and guidelines under which your organization or department operates

Procedures

- Describes how that task should be done
- Specific instructions for employees to follow
- Are the means for putting policies into action

BCFNDGI Resources

<https://www.bcfndgi.com/data-governance>

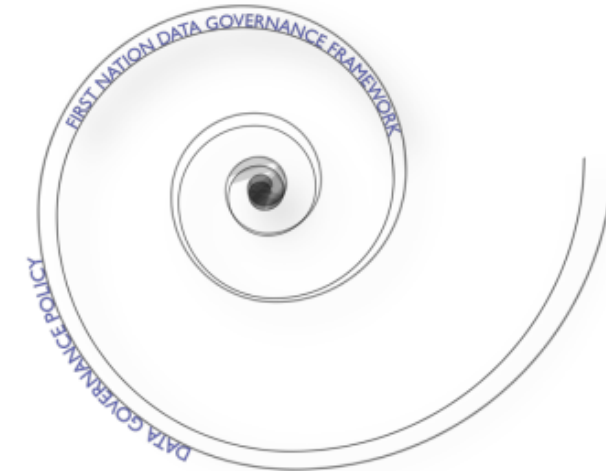
Data Governance Policy Manual

Privacy and Security Policy Manual

Data Governance Framework

Data Governance Policy Manual

<NAME OF NATION>



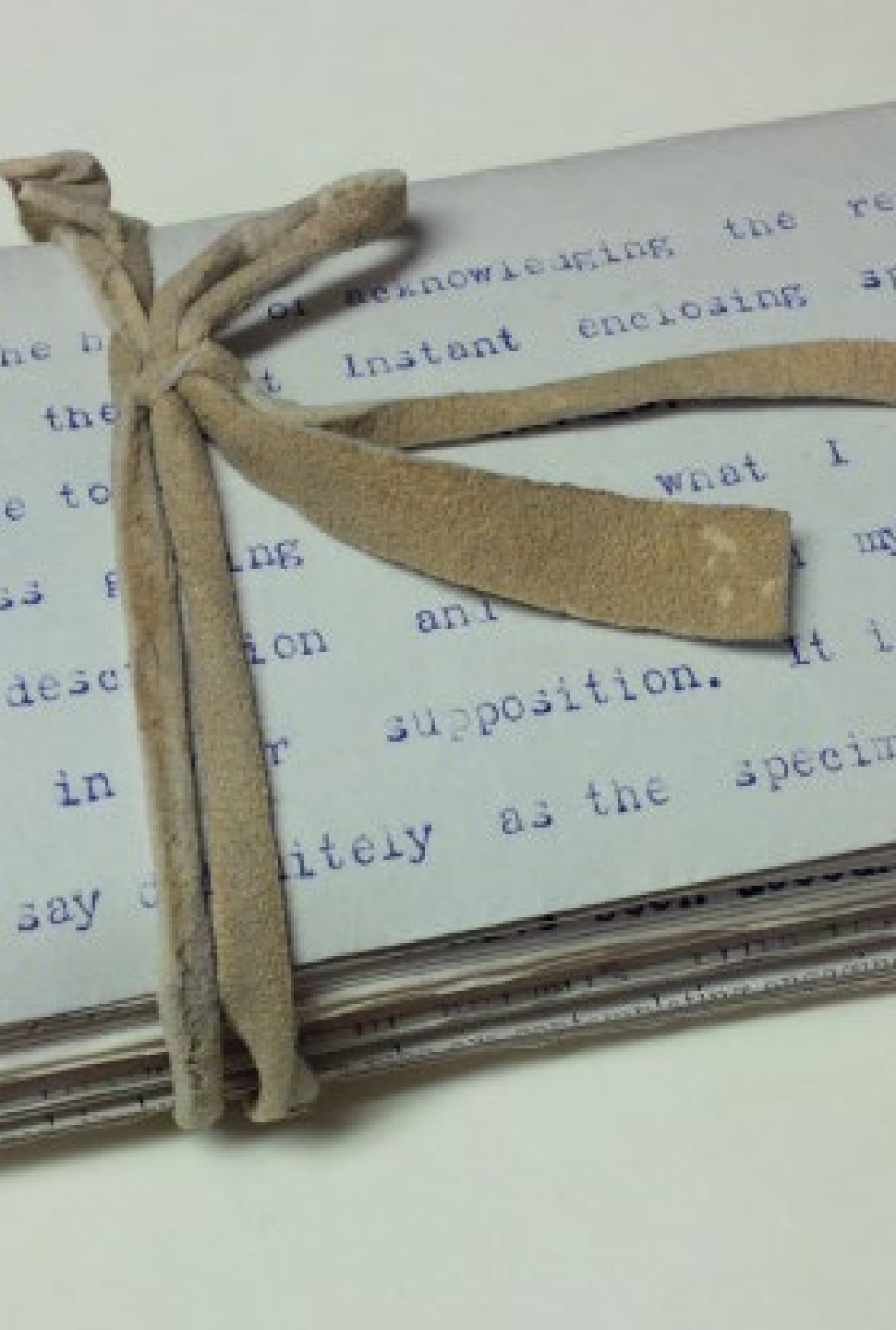
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RIM and Archives



- RIM practices directly impact archives operations
 - Sheer volume of records to be reviewed and rehoused
 - Appraisal, arrangement and description
 - Specific software applications available to accommodate *Rules of Archival Description*
 - Are typically not integrated with software used to manage active records (e.g. EDRMS)
- Archival practices intersect with RIM at the point where permanent records are transferred to the archives
 - Specific discipline
- Focus on protecting material and providing appropriate access
- Archives are different from libraries
 - Contain unique and often one-of-a-kind material
 - Material must be processed in order to be made available for use
 - Must adhere to the permissions and conditions of use granted from donors



Ktunaxa Nation Archives

- Established in 1997 to support Treaty process
- Serves to protect records of value and support Ktunaxa Nation rights
- Holdings consist of KNC operational records and donations from Ktunaxa Citizens and the public
- Oldest record is dated January 1, 1867

Typical Activities

- Processing transfers, donations, and backlog
- Digitizing records of value
 - Paper documents
 - Photographs
 - Sound recordings
- Responding to research requests
 - KNC staff and contractors
 - Ktunaxa Citizens
 - External researchers





Access to Archival Holdings

- Material is subject to limitations:
 - Organizational policies
 - Code of Ethics for Researchers
 - Cultural Resources Policy
 - Access and Restrictions Policy
 - Donor agreements
 - Legislative requirements
 - Privacy legislation, *Copyright Act*
 - Physical condition of materials
 - Protect from damage, theft, etc.

Access Controls and Protection

- Material stored in offices or basements is often “cherry picked” over time
- For example: Traditional Use Studies
 - Originals were removed rather than copied leaving gaps in the records
 - Audio recordings cannot be located
 - Annotated map layers cannot be located
- Having access controls in place is essential to protecting information and maintaining authenticity, integrity and reliability of the records
 - Physical security measures (authorized personnel, secured space)
 - Supported by policies and procedures

Access Restrictions

- Goal is to make information easily available for use
- Must identify categories of sensitive information that may result in harm if disclosed, including:
 - Closed meetings
 - Solicitor-Client Privilege
 - Intergovernmental Relations or Negotiations
 - Archaeological Sites
 - Personal Information
 - Cultural or Spiritual Information
 - Traditional Knowledge is outside of the existing Western framework
 - Requires collaboration with Elders and Citizens to define levels of restriction for Traditional Knowledge
 - Unique to each Nation

Final Thoughts

Managing information consistently and effectively takes time and ongoing collaboration

- Everyone has a role to play

Begin by securing Leadership support

- Business Case
- Assessment Report

Focus on important, key record series to build success

- Leadership Meeting Records (agenda packages, minutes)
- Resolutions
- Agreements and Contracts
- Policies and Procedures

Suggested Resources

- Data Governance and Management Toolkit <https://indigenousdatatoolkit.ca/>
- First Nations Public Service Secretariat
 - Information Management Toolkit <https://fns.bc.ca/fnps>
 - Management Training Academies <https://fnps.ca/mta-records-and-information/>
- Irving K. Barber Learning Centre (UBC Library)
 - Indigitization Toolkit <https://www.indigitization.ca/toolkit/>
- Archives Association of BC
 - Archivist Toolkit and Manual for Small Archives <https://aabc.ca/resources/archivists-toolkit/>
 - Indigenous Archives and Record-keeping page <https://aabc.ca/resources/indigenous-archives-and-record-keeping/>
- ARMA International <https://www.arma.org/>

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