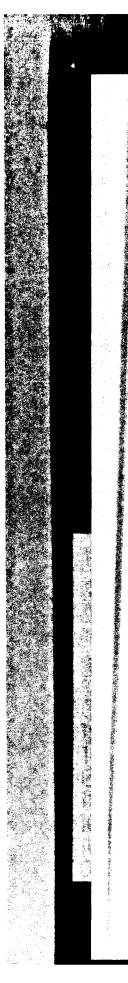
# managing decidence

edited by

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# Chapter 1

# The wild frontier ten years on<sup>1</sup>

JOHN McDONALD

#### Introduction

Ten years ago I wrote an article entitled 'Managing Records in the Modern Office: taming the wild frontier' (McDonald, 1995). It focused on the challenges organizations were experiencing in managing their e-mail and other electronic documents in the unstructured office environment. This environment, common in most organizations at the time and, as this chapter will argue, still too common today, was one where business processes and workflow were not clearly defined, the user had relative autonomy over what information was created, sent and stored, and accountability for the management of information was unclear.

At that time I felt that the wild frontier was as temporary as the frontier the US and other areas of the world experienced back in the 19th century. In the early pioneer days ad hoc approaches to settlement and a rather chaotic approach to law and order gave way to a more settled environment where the rule of law and the means to enforce it were established. Responsibility for administering the environment was assigned and technologies (telegraph, roads and so on) were introduced to foster economic and social growth. In my naïveté I thought that it was a matter of time before the wild frontier of the modern office would evolve in the same way, spurred on by technology developments, new ways of organizing and designing work processes, and new techniques for making recordkeeping transparent and nearly automatic.

#### Managing electronic records

When 1 wrote the article I had naïve hopes and expectations of the technology that the future of recordkeeping was just around the corner. I envisioned a desktop where the icons on the screen would change to work driven icons supported by integrated workflow, wordprocessing, forms and routing software. It would also enable automated and transparent recordkeeping based on business rules developed for program managers by highly knowledgeable and skilled records managers and workflow/business analysts – all working together in harmony!!

A year or so later, Margaret Hedstrom (1997) reinforced this perception by explaining that there were others 'out there' who shared the same concerns as archivists and records managers about the management of electronic records and who were actively engaged in developing solutions. As far as I was concerned, with that kind of support and acknowledgement coupled with the growing expertise of the records management and archives professions, it was just a matter of time before we reached recordkeeping nirvana!

So here we are ten years later. Has the sheriff come to tame the wild frontier? Do we have a realistic view of technology and do we use it effectively? Are authentic and reliable records being generated in the office environment and being captured into recordkeeping systems? Have we reached the holy grail of recordkeeping where the right records are being generated, captured (ideally in a transparent manner), maintained and used in the right form at the right time for the benefit of the 'right' people (from program staff to archivists to the general public)?

This chapter suggests that, while significant steps have been taken, the path out of the wild frontier remains as elusive for most organizations as it was ten years ago. The chaos presented by e-mail and other electronic documents scattered around on C drives and unorganized shared drives remains as real today as it was ten years ago. And the frustration felt in not being able to find the right version, the critical briefing note, memo and so on, or to establish the complete story on an issue, or to cope with the growing mounds of diverse forms of information, is just as intense. The frontier of the modern office is still 'wild'.

There are reasons for this and there are also ways out of the wilderness, which this chapter seeks to identify. The chapter begins by exploring the changes that have taken place in the infrastructure of policies, standards and practices, systems and technologies and human resources required to manage electronic records in the office environment. This sets the stage for an explanation of why the wild frontier has persisted, offers some suggestions concerning how the pace of change might be accelerated, and explains why such accelerated change has become an imperative.

# Infrastructure for managing electronic records

The effective management of electronic records is not just a technology issue. It requires an infrastructure of laws and policies, standards and practices, systems and technologies, and people, all supported by an effective management framework and leadership capable of continually aligning the infrastructure in support of the business of the organization. Over the past ten years the components of the infrastructure have experienced considerable change – some positive and some not so positive.

#### Laws and policies

In terms of recordkeeping *laws and policies*, for instance, some progress has been made over the past ten years in establishing accountability frameworks for the management of information including information in records.<sup>2</sup> New Freedom of Information (FOI) and privacy laws have been introduced and existing laws have been updated.<sup>3</sup> Evidence laws have confirmed the admissibility of electronic records<sup>4</sup> and new policies have been developed to guide the development of integrated approaches to the management of information (including information in records) (Treasury Board of Canada Secretariat, 2003). Increasingly such policies are being driven by business requirements,<sup>5</sup> in addition to requirements that focus on 'good' government, accountability and the public right to know.

It has been one thing to see records-related laws and policies developed but it has been quite another to see them implemented. The track record for policy implementation over the past decade has been poor. Major factors have included lack of resources, absence of strong leadership and, above all, poor understanding of what it means to design and implement records management infrastructures that are relevant to the new environment. The absence of strong, generally accepted and implemented policy frameworks, especially those that codify accountability for records and information, has been a major factor impeding the development of solutions that address the challenges presented by the wild frontier.

# Standards and practices

Unlike the situation a decade ago, and as referenced in Chapter 2, there are numerous examples of *standards and practices* that have been developed by jurisdictions around the world to address the management of electronic records. The ISO Records Management Standard (ISO, 2001) (under revision) is a remarkable achievement that offers an excellent framework for establishing programs and systems for the management of records. The national archives of major countries as well as state and local archives and records programs have been very active in developing the tools and techniques to turn electronic records management into a reality.<sup>6</sup> Emerging open source standards, metadata models and digital preservation strategies offer the first hints that information interoperability across space and through time is possible.<sup>7</sup>

Unfortunately, similar to the situation for laws and policies, the pace of implementation has been slow. Why? It is not for want of recordkeeping standards. In large part it is because we have yet to gain an adequate understanding of how the modern office functions, how people collaborate, how decisions are made, and how information is generated, shared, used and maintained. Recordkeeping standards and practices will be difficult to implement as long as there is an absence of standards and practices for managing the way work is undertaken in the modern office.

They will also be difficult to implement if they are not placed within a broader information management context. The standards and practices employed by previously distinct disciplines such as publishing and communications (especially via the web), library services and records management are converging. The need to develop broad, multi-disciplinary approaches to metadata models and architectures is simply one of many examples that underline the fact that there are multiple but overlapping frontiers that need to be tamed. Nevertheless, collaboration across the information disciplines has been slow and silo-type approaches to the development of records management standards and practices have continued. These factors can only continue to impede progress in the development of standards and practices that are relevant to the needs of the increasingly complex office environment.

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## Systems and technologies

Over the past decade strong advances have been made in the development of systems and technologies that enable the effective management of electronic records. From automated records management systems for paper records' and the first research efforts back in the early 1980s," to standalone electronic recordkeeping systems in the early 1990s, to their merging with document management systems in the late 1990s, to their incorporation into the mainstream products of major computer companies over the past few years, the evolution of these systems has been remarkable. Requirements definitions have become standardized<sup>10</sup> and various approaches to procurement have been adopted. Some organizations are even learning that successful applications are those where the systems have been mapped to one or multiple business processes.<sup>11</sup>

In spite of this progress, however, there have been far too many cases where electronic document and records management systems have been introduced simply as places where people can dump their e-mails, attachments and other electronic documents. Such cases typically fail. User resistance based on a lack of understanding of the benefits of the system, lack of user friendliness, lack of integration with other technologies, and inadequate approaches to classification and retrieval, inter alia, is often the chief reason for failure. Above all they fail because steps have not been taken to identify and define the work processes that would otherwise have provided a context and need for automated recordkeeping solutions. Compounding these factors is the general lack of expertise required to design the systems and integrate them into the modern office environment.

A related technology issue concerns the intranet. In the rush to develop easy-to-use, friendly portals to permit citizens and clients to access services and information, the enhancement of the public websites has been generating far greater attention than intranets. My mother has far greater access to government information and services than does the average government employee who is still facing a screen full of utility-based icons ranging from word-processing to e-mail. The vision expressed a decade ago of a screen supporting work-activity-driven icons supported by integrated software and work processes (supported by templates, automated routing and so on) reflecting automatic and transparent 'behind-the-screen' approaches to recordkeeping has yet to be realized.

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Given the incredible technological changes that have taken place over the past ten years it is remarkable that the design of our desktops and work processes (if they can be identified at all) have remained essentially the same. And, after ten years, it is remarkable that we still have not invested the time and energy required to understand how the office functions and how it can benefit from advanced tools and techniques for managing work processes and the information associated with those processes.

#### Human resources

The absence of effective intranet environments supported by innovative approaches to work process design is one of the most important reasons why the vision expressed ten years ago has failed to become a reality. And underlying why this has happened has been the absence of skilled and knowledgeable *human resources*. In the vision expressed ten years ago, it was expected that a cadre of records management specialists would be in place to facilitate the development of the required infrastructure for managing information in the wild frontier. In some cases this has occurred. Competencies have been developed that were not around a decade ago.<sup>12</sup> Education and training providers have adjusted their curriculum with the expectation that more and more of their graduates will find their way into higher level and more influential information management positions. Course materials and teaching staff are in place in some institutions and jurisdictions that had not even been considered a decade ago.<sup>13</sup>

For many it has been too late. Organizations lost many records management staff in the 1990s as administrative budgets were cut and new computer systems (and their vendors) promised fewer cares. With the expectation that technology would provide the solution, most failed to invest in upgrading or acquiring the necessary knowledge and skills. The lack of e-records management capacity has been a critical factor in the inability of organizations to introduce the tools and techniques that would have otherwise addressed the challenges presented by the wild frontier.

## Management frameworks

A decade ago, the *management frameworks* responsible for governing the infrastructure of recordkeeping policies, standards and practices, systems and technologies and people were often under a senior official responsible for administration. The concept of the Chief Information Officer (CIO) was

still emerging and, just as is the case today, most were seen as technology officers rather than information officers. Today the CIO concept is still nebulous but on an increasing scale, information management (IM) programs such as library services, records management, web content management, data management and so on are finding themselves located under a CIO.<sup>14</sup>

One would think that such an assembly under a sole authority would raise the profile of records management and foster interdisciplinary approaches that would place records management in a broader context. The reality, however, is that most ClOs are struggling with what it means to build an IM program.<sup>15</sup> Few organizations have defined 'information management', established a vision of IM and, within the context of such a vision, developed a vision of what it means to manage records, especially within the context of the wild frontier environment of the modern office.

One of the major inhibitors to progress in the development of more advanced management frameworks has been simply the lack of understanding managers have of records and records management. One can't govern effectively something that one hasn't defined and doesn't understand.<sup>15</sup>

#### Leadership

These management issues could be addressed, however, if there was *leader-ship*. Leadership (and the lack thereof) is the single most important factor impacting the ability of organizations to move forward on the management of electronic records in the 'wild frontier'. In some governments leadership is beginning to emerge through the active role of central and lead agencies – a phenomenon that was relatively rare just a few years ago when few seemed to feel it was so important. In the Government of Canada, for instance, the Chief Information Officer Branch of the Treasury Board Secretariat has been working in partnership with Public Works and Government Services Canada and Library and Archives Canada to develop government-wide leadership to the development of strategies for addressing electronic records management issues. Senior level committee structures focusing on information management concerns are in place that were not there ten years ago. Other examples of collaboration and central agency direction can be found in other governments around the world."

In too many cases, however, confusion over roles, responsibilities and strategic direction, coupled with a general lack of resources and expertise, have croded the capability of these organizations to exercise a leadership role. The lack of understanding about electronic records and records management on the part of potential leaders is also a major consideration. Sometimes the role of an archives service can become an issue if it hasn't been clear about its objectives. Archives are logical candidates for the leadership role by virtue of the fact that they have a vested interest in the preservation of and long term access to electronic records and because they have developed the necessary knowledge and expertise.<sup>18</sup> However, the execution of their leadership role can be shaped in different ways dependent upon its objectives. If the objective of the archives in facilitating the better management of records is solely to secure the archival record then its strategies will take one perhaps narrowly focused form. If its objective is to support 'good' government while at the same time securing the archival record then its strategies will take another perhaps broader form. The lack of clarity on the part of the archives about its objectives can lead to confusion among the other lead players and inhibit the exercise of leadership that those living in the wild frontier are searching for.

All of these issues underline the fact that, while the frontier is no longer new (after all, the modern networked office has been around for some time), it is still 'wild'. For many organizations the reality still persists of outof-control e-mail, information scattered all over C drives and servers, corporate amnesia, and a general lack of control and requisite leadership.

# How the pace of positive change might be accelerated

Rather than end on a depressing (but realistic) note, however, I'd like to offer a few suggestions for how the pace of positive change might be accelerated. These suggestions focus on establishing a vision, enhancing awareness, assigning accountability, designing an architecture, and building capacity.

#### Vision

It may seem academic to say that we need a *vision* but, in the case of managing electronic records in the modern office environment, it is a fundamental building block on which everything else rests. In arriving at a vision of recordkeeping, however, it is important to build a vision of how the organization can be more effective in carrying out its mandate. This is a prerequisite to any vision of the underlying infrastructure and follows the

principle that recordkeeping in the modern office will get better only if improvements are made in the way in which the modern office operates. Or, in other words, in addressing the management of records one should not start with the records. One should start with the processes that generate the records. In those areas where work processes are ill-defined and where program staff are experiencing significant problems in carrying out their work such a vision can be a catalyst to finding relevant solutions. It can also help an organization pursue significant opportunities that enable staff to take full advantage of the technology and information resources. It is only through such a vision that gaps in work process design can be identified and, from this, that initiatives addressing both work process design and associated recordkeeping can be established.

#### Awareness

A business-driven vision of recordkeeping is impossible unless those developing the vision and those who will be subscribing to it have an adequate level of *awareness* about recordkeeping concepts and the role records play in supporting the business and accountability requirements of the organization. The fact that many people still see records management as the management by file clerks of paper-based information no longer required to serve the immediate needs of the organization is a clear indication that much needs to be done to re-assert the importance of records and records management. In the modern office environment, little progress will be made as long as the records creators and users in this environment view records as the residue of their actions or as some administrative overhead.

#### Accountability

Accountability for the integrity of highly structured applications systems and for the integrity of the data generated in these systems is often much clearer than it is for the wild frontier environment where work processes are poorly defined and accountability for records may not be as clear. Guidance is required on developing and implementing accountability frameworks for records (ideally situated within broader accountability frameworks for information generally). Such frameworks would make clear distinctions between the accountabilities of program staff at all levels and the accountabilities of the records specialists responsible for establishing and maintaining the enabling records infrastructure (Canadian International Development Agency, 2001).

#### Architecture

We often speak about the need to develop new policies, establish new file classification systems or introduce new recordkeeping technologies to deal with the wild frontier but seldom do we assemble these components into an *architecture*. Such an architecture would ensure that the components of the records management infrastructure (policies, standards and practices, systems and technologies, human resources) are designed, built and maintained as an integrated whole within the business context of the organization. Good systems designers use a business-centred model to guide their architectural designs – so too should records and information managers. It is when a business model and the associated records architecture are jointly established that one can populate the components of the underlying infrastructure (knowing that those components will always have a business context). Finally, in ideal circumstances, the records architecture would form an integral part of an overall architecture for information management and information technology management.

#### Capacity building

The establishment of the vision, the accountability framework, the architecture and the underlying infrastructure require human *capacity* – people who have the required knowledge and skills to make it happen. In most organizations these individuals, especially those who could assume a leadership role, simply do not exist. If organizations are to migrate from the wild frontier they need to invest in specialists who understand recordkeeping and, above all, can help organizations improve the way they carry out their work. The eradication of 'organization and methods' experts has left a vacuum in terms of the expertise required to enhance office performance. Such a vacuum needs to be filled either by a new cadre of work process design specialists or by records specialists who recognize that work process design, business rule development and so on, must be addressed before effective recordkeeping can happen.

Needless to say all of this will have important implications for records management education and training providers, not to mention the development of strategies that must address a host of human resources issues such as job descriptions, job classification, training and recruitment, rewards and recognition, performance measurement and so on. The opportunity for the records management profession can be considerable because this extension of role into work process improvement might serve as a catalyst for migrating the profession from one that is perceived as clerical and operational to one that is strategic, standards setting and directly relevant to the business.

### **Towards a new vision**

The pressure to accelerate the settlement of the wild frontier is increasing exponentially as society and organizations embrace the electronic environment. Ten years ago the web was still in its infancy and web browsers, the technologies that really helped to position the web as a viable instrument of business and pleasure, had only just been developed. Today the internet is pervasive and web-enabled services accessed through increasingly sophisticated portals are becoming central to the way in which members of society interact with one another and the way in which organizations shape themselves to provide improved services and remain competitive. The web-enabling of business functions and activities, such as those supporting e-commerce and e-government, are blurring the lines between the web, the highly structured applications systems environment and the unstructured 'wild frontier' environment as organizations strive to provide seamless information and retrieval services.

# Increase in computer literacy

Over the past decade computer literacy has increased exponentially. From using debit machines, to playing games, to taking digital photos – people (especially young people) in all walks of life are becoming familiar with what it means to work with computers and, more importantly, with electronic information. People are creating their own electronic archives comprising e-mails, computer games, MPEG files and, more recently, digital photos. As these types of information objects augment more traditional forms of information, people are becoming more sensitive to the issues that office workers have been experiencing for years. How do I file these things? What do I name them and how do I describe what they are? How do I retrieve them when I need them?

#### Managing electronic records

They are also discovering the challenges of finding the valuable needles of critical information in the haystack of information that is returned as a result of a Google search. They are experiencing the same frustration about the information glut as the office worker. They are also becoming concerned about the issue of trust and reliability. How do I know I have reached a government site? How reliable is the information I have just accessed? Is it the right version? Is it current? Is it complete? These are the same questions that have plagued office workers for over a decade.

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Within the office a whole new computer literate generation is entering the work force. Their expectations will be high that a trusted information environment will be in place to capture authentic and reliable information and to provide relevant, accurate and complete information as and when required. They will be less tolerant than members of the slowly disappearing 'wild frontier' generation, who, while frustrated, seemed to conclude that the challenges they faced were simply the cost of doing business. This new generation has heightened expectations concerning the ability of governments to manage information – on the one hand, from the perspective of the citizen expecting that the government can be trusted to manage the information supporting the online transactions the citizen is engaged in; on the other hand from the perspective of the employee expecting that he or she will be able to generate, use and maintain effectively the information that underpins the trust relationship.

This is a generation that is poised to establish a vision that will be much more advanced than the workflow-driven recordkeeping vision expressed ten years ago. What would such a vision look like (he says cautiously as a member of the previous generation)? Likely it will be rooted in the concept of the mobile worker who is concerned as much with relationship building as he or she is with their position in an organization. Cell phones, handhelds, instant messaging, laptops and desktops will be their tools and information in multiple forms from multiple locations will be the fuel that drives them. Web-based portals accessed via a variety of means will serve as secure gateways to a host of information sources and services – some local to the host organization and others spread around the world. Information access and retrieval will be seamless. More importantly it will be customized and often pre-prepared in anticipation of information requirements.

# Customizing the interface

The interface will be customized for both the worker and the customer or citizen and the concept of an intranet separate from the internet or extranet will disappear. Citizens will be able to dip directly into the records systems of government agencies (subject to security restrictions) in order to scrutinize the conduct of government business (presumably just as government will have the potential to sweep across the personal financial accounts of individual citizens to facilitate, for instance, tax collection).

Records will be captured automatically based on predefined rules and integrated web-enabled workflow. Rather than being stored in central repositories, they might be distributed and managed in much the same way as scientists are using the unused computing power of home computers to perform complex calculations. So too could records managers employ the unused space of partner organizations (government agencies) to hold and manage valuable electronic records. Space management systems would move and migrate records among the various 'spaces' according to predefined criteria. Sophisticated software would ensure effective access and retrieval. According to such a model the archives would no longer need a repository. Archival records would have already been flagged and their management as archival records would have been looked after automatically.

#### Leadership

The achievement of such a vision of the future depends on the same factor that has had such an impact on the achievement of the vision expressed a decade ago. Leadership! Without leadership there can be no vision. Without a vision (founded in awareness and assigned accountability) it will be impossible to develop an effective architecture to guide the way forward. Without an architecture it will be impossible to develop the kinds of infrastructures that will turn a vision into a reality.

In the case of the 'wild frontier', if the records management and archives professions are unable to undertake the leadership role required then someone else will. And they will do so knowing they are simply dealing with issues that should have been addressed a decade ago – issues that, once resolved, will enable them to take the lead in the far more exciting task of building towards the vision of the future. It will be up to the records management and archives professions to determine if they want to be part of that new frontier.

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#### Footnotes

- 1 The author is grateful to Andrew Lipchak and Hans Hofman for their valuable comments on earlier drafts of this chapter.
- 2 An example is the comprehensive Accountability Framework for Information Management developed by the Canadian International Development Agency, 2001.
- 3 There are many examples around the world of governments enacting freedom of information and privacy legislation from the UK, Canada and the developed world to Jamaica and other developing countries. The Canadian federal government's *Policy on the Management of Government Information* is an example of a comprehensive business-driven policy that embraces all forms of information

(see www.tbs-sct.gc.ca/pubs\_pol/ciopubs/TB\_GIH/mgih-grdg\_e.asp).

- 4 Evidence laws that account for the admissibility of electronic records have emerged in many countries. One example is the *Canadian Protection of Personal Information and Protection of Electronic Documents Act* (http://laws.justice.gc.ca/ en/P-8.6/index.html).
- 5 The purpose of the *Management of Government Information Policy* developed by the Canadian federal government is: 'to ensure that information under the control of the Government of Canada is managed effectively and efficiently throughout its life cycle. Federal government institutions must manage information in a privacy protective manner that supports informed

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policy and decision-making and the delivery of high quality programs, services and information through a variety of channels and in both official languages.'

6 See examples such as the DIRKS methodology produced by the National Archives of Australia (www.naa.gov.au/recordkeeping/dirks/summary.html), the toolkits prepared by The National Archives of the UK

(www.nationalarchives. gov.uk/electronicrecords/default.htm), the Canadian federal government's IM portal

(www.tbs-sct.gc.ca/im-gi/im-portal/portal-portal\_e. asp) and the 'fast track' products and other information produced by the US National Archives and Records Administration

(www.archives.gov/records-mgmt/policy-fast-track.html).

7 Some examples include Interpares (www.interpares.org/ip2\_index.cfm), the Victorian Electronic Records Strategy

(www.prov.vic.gov.au/vers/digitalarchive/) and the model presented in the Open Archives Information Systems (OAIS).

- 8 The functional requirements for electronic recordkeeping that were used in the FOREMOST and IMOSA projects in the 1980s were derived from a set of functional requirements for automated records management systems for paper records that had been developed by Jacques Malette of the National Archives of Canada in the late 1970s.
- 9 The 'Information Management Office Assessment' (IMOSA) project was a collaborative private-public initiative sponsored by the National Archives of Canada and the Canadian Workplace Automation Research Centre. The 'Formal Records Management Using Office Systems Technologies' (FOREMOST) project was a small pilot project involving the testing of prototype electronic records management software using a small group of users within the Policy Branch of the Department of Communications.
- 10 Examples include the US Department of Defense standard (http://jitc.fhu.disa. mil/recmgt/standards.htm), the MoReq standard produced by the European Commission (www.cornwell.co.uk/moreq) and the Records, Documents, and Information System (RDIMS) standard suite of software procured by the federal Government of Canada (www.pwgsc.gc.ca/rdims/).
- 11 One example of a growing number is the <u>workflow</u> driven electronic records management application developed by Agriculture and Agri-food

- . Canada; the application won a gold medal at the annual Government and Technology conference in Ottawa, Canada, 2004.
- 12 An example is the competency standard for the information management specialist produced by the Alliance for Library, Archives and Records Management (ALARM)

(www.fis.utoronto.ca/people/affiliated/alarm/keypol.htm).

- Examples include the universities of British Columbia (www.slais.ubc.ca/index.htm), Toronto (www.fis.utoronto.ca/index\_MSIE.htm), Monash (www.sims. monash.edu.au/index.html) and Northumbria (http://online.northumbria.ac.uk/prospectus/coursedetail.asp? CourseID=178).
- 14 This may not be true for all jurisdictions but it has become prevalent across the Government of Canada.
- 15 One CIO explained that while he was pleased that all the IM disciplines now reported to him and that he understood intuitively the importance of bringing them together, he wasn't sure what he was supposed to do with them.
- 16 Several years ago a friend of mine told me that she had been walking down the hall when she bumped into a colleague who had just emerged from a meeting where senior executives were discussing the management of electronic records. When asked why she was shaking her head, her colleague explained that it was like listening to 10-year-old kids talking about sex - they were mature enough to know how important it was but not mature enough to know what it *really* meant.
- 17 Leading examples at the national level include the governments of Australia and the United Kingdom. In both cases leadership is coming from the respective national archives. Similar examples also exist at the level of the state (e.g. state of New South Wales), and the province (Government of Alberta).
- 18 In fact, according to two of the four ICA principles that were developed by the ICA Electronic Records Committee

(www.ica.org/body.php?pbodycode=CER&plangue=eng) regarding the role of archives in managing electronic records, archives are expected to be involved in facilitating the establishment of policies, systems and standards and practices to support the life cycle management of the records required by government to administer themselves and hold themselves accountable.

And not only should they be establishing policies, systems and standards and practices, they should also be directly involved in their deployment through training, providing advice and so forth.