



City of Markham

Information and Records Management Audit

November 30, 2020

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Mayor and Members of Council,

Pursuant to MNP LLP's ("MNP") appointment to provide Auditor General Services, I am pleased to present the Information and Records Management audit report ("report") of the Auditor General for the City of Markham ("City"). To ensure the results of our audit are balanced, we have provided in this report a summary of identified strengths, as well as observations and recommendations for improvement.

The audit work was substantially completed on February 1, 2020. The report was discussed with the City's Management, who have reviewed the report and provided their responses within. This report is provided to you for information and approval of the City's proposed action plans.

Based on the results of our audit, the City has some processes and controls in place for records and information management and is working towards becoming fully compliant with the related policies and By-Law 2017-151 ("By-Law). There are areas of good practices which include having records management software to track physical records and having a robust methodology to determine the readiness of datasets to be publicly available online.

Opportunities for improvement were also identified. These include the development of an information management strategy and program, implementing continuous monitoring and oversight of information and records management, maintaining compliance with the City's Record Classification and Retention By-law, conducting information and records management training, and enhancing the Freedom of Information ("FOI") request process.

The report will be posted on the City's website and made available to the public after tabling to Council.

Sincerely,



Geoff Rodrigues, CPA, CA, CIA, CRMA, ORMP
Auditor General, City of Markham

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EXECUTIVE SUMMARY

The City has made significant progress in advancing its information and records management program over the past two years. The Legislative Services & Communications Department sets the direction for information and records management and City departments are responsible for maintaining records under their custody. The City's Record Classification and Retention By-Law 2017-151 was approved by Council in December 2017 and was updated to adopt international best practice frameworks.

The City has also undertaken initiatives to advance its information and records management program, including;

- Developing a Corporate Records & Information Management Policy to complement By-Law 2017-151;
- Data cleansing activities to remove redundant, outdated and trivial information from the Markham Museum;
- Establishing the Leveraging Technology Steering Committee to provide strategic enterprise leadership for the oversight of key information technology and digital objectives, initiatives, and activities; and,
- Council approval to hire one additional resource to support in developing a long-term information and records management strategy, procedures, and training material.

The Municipal Act, 2001 states that the Council of a Municipality shall retain and preserve its records in a secure and accessible manner and establish retention periods during which the records must be kept by the Municipality. As such, going forward the City must ensure that it is in full compliance with By-Law 2017-151.

As Auditor General for the City, MNP conducted an audit to evaluate the policies, processes, and controls in place over records and information management, assess compliance of departments with the City's information and records management policies and By-Law 2017-151; and provide recommendations for improving the efficiency and effectiveness of records and information management processes, ensuring they align with the City's operating environment. The scope of the audit focused on the following:

- Design effectiveness of the City's information and records management policies, processes, and governance structures;
- Record retention/destruction policies;
- Compliance with the City's records and information management related policies; and,
- FOI request handling and tracking against Municipal Freedom of Information and Protection of Privacy Act ("MFIPPA") requirements.

There were some noted areas of strength, which include:

- A records management software is utilized to track and manage the lifecycle of physical records.
- A formalized data readiness assessment methodology is utilized to support the Open Data Program.

The audit also identified opportunities to strengthen processes and internal controls in the following areas:

- The City does not have a long-term strategy and program to support its information and records management activities and initiatives.
- There is little information and records management monitoring and oversight following the existing governance structure within the Corporate Records and Information Management Policy.
- The City is not fully compliant with the Classification and Retention By-Law 2017-151, as mechanisms are not in place to ensure that electronic records in network shared drives, applications, and databases used to manage business activities are being monitored against By-Law 2017-151.
- City department staff are not familiar with the requirements outlined in the Corporate Records and Information Management Policy and By-Law and have received minimal training.
- The FOI request tracking and review process is inefficient.

Based on the audit, the City does not have sufficient processes and controls in place over information and records management activities.

BACKGROUND

Information management relates to the organization and control over the structure, processing and delivery of information. It involves managing information through its entire lifecycle, including the collection and management of information from one or more sources, the distribution of that information to one or more audiences, and ultimately disposition through archiving or deletion.

Records management is the systemic control of the creation, receipt, use, maintenance, retention, and disposition of documents, data or other recorded information. While often referred to interchangeably as document management, records management and document management are quite different.

Document management is the development and daily management of in-progress documents. While documents are being developed and worked on (i.e. controlled by the respective document author(s)), the document can be managed inside a document management software/system for the day-to-day capture, storage, modification and sharing of electronic files within an organization. At the City, documents are managed inside various systems, depending on the nature of business.

Records management starts once the document is considered final, and it is “declared” as a “document of record”. At this time, transitory records, which are of temporary/insignificant value and which are needed to prepare the final version of records, would be destroyed. A copy of the final document (“record”) would be placed into a records management software/system. At the City, this would be the Infolinx system for physical records only, as there is no software/system for electronic records. The required metadata¹ would be added to the record at this time, to ensure it is properly classified and managed. This metadata typically indicates the type of record, length of retention period, and any applicable business rules. The record would be made immutable (i.e. read-only) by the records management system/software and the original version of

¹ Metadata is a set of data that describes and gives information about other data (i.e. content, context and structure of records).

the document remains in the document management software/system, available for the author(s) to create a new version if needed (which would also be declared a record and follow the same process as above).

In 2008, an external consulting firm performed an assessment of the City's information management system, which resulted in an information management strategy report, citing major findings regarding areas including business process documentation, data integration and sharing, and lack of inventory of information assets. To assist in the implementation of recommendations contained in the 2008 report, the City issued two procurements - one for an external consultant in 2011 and one for a corporate electronic agenda management system in 2013 – however, both procurements were subsequently cancelled due to the City's lack of readiness to implement recommendations and the City's reconsidered technology strategy approach.

More recently in 2017, the Legislative Services & Communications Department undertook an initiative to assess the City's records and information management practices. This included identifying redundant, outdated, and trivial information in electronic drives, updating records management processes and policies, and exploring opportunities to hire more dedicated records management staff. As well, the City refreshed By-Law 2017-151: The City of Markham's Classification and Retention By-Law, which was approved by City Council on December 2, 2017.

By-Law 2017-151 is the City's official guidance for records management, providing staff with the authority to manage records in accordance with relevant policies, legislation and regulations. By-Law 2017-151 is supplemented by the Corporate Records and Information Management Policy ("Policy"). The City has adopted International Organization of Standards ("ISO") 15489, which provides a functionally based classification structure and hierarchical framework for the organization and description of records.

In addition, the City receives over 100 requests annually for information under the MFIPPA. As a result, the City must be able to effectively retrieve records in a timely manner to satisfy external information requests and maintain compliance to the Act.

OBJECTIVE

The objectives of the audit were to:

- Evaluate the policies, processes, and controls in place over records and information management;
- Assess compliance of departments with the City's records and information management policies and applicable by-laws; and,
- Provide recommendations for improving the efficiency and effectiveness of records and information management processes, ensuring they align with the City's operating environment.

SCOPE

The scope of the audit was on records and information management activities, covering the period from September 1, 2018 to August 31, 2019. Specifically, the scope of the audit focused on the following:

- Review of the design effectiveness of the City's records and information management policies, processes, and governance structures against best practice frameworks (i.e. ISO-15489², COBIT³, DAMA⁴, and TOGAF⁵).
- Review of the City's record retention/destruction policies, and verify through a sample, that records are retained, destroyed, or stored as required.
- Assess compliance with the City's Corporate Records and Information Management Policy, and Classification and Retention By-law 2017-151 through sampling records from four sample departments, which included:
 - Legislative Services & Communications;
 - Environmental Services;
 - Building Standards; and,
 - Human Resources.
- Review the City's FOI request handling and tracking against MFIPPA requirements.

RISKS

The following inherent⁶ risks were considered during the audit, which given the scope of the audit are typical risks to be considered:

- Records and information management strategies and governance structure are not adequate.
- Aspects of records and information management processes are not sufficiently scalable to the size of the organization.
- Records are not retained or are destroyed according to retention schedules.

² ISO-15489 Information and Documentation - Records Management is an international standard for the management of business records, specifically records management. This standard provides an outline for comprehensive assessment of full and partial records management programs. It was developed by The International Organization for Standardization ("ISO").

³ Control Objectives for Information and Related Technologies ("COBIT") is a good-practice framework created by the Information Systems Audit and Control Association ("ISACA") for information technology ("IT") management and IT governance.

⁴ The Data Management Association ("DAMA") is a non-profit and vendor-independent association of business and technical professionals that is dedicated to the advancement of data resource management ("DRM") and information resource management ("IRM").

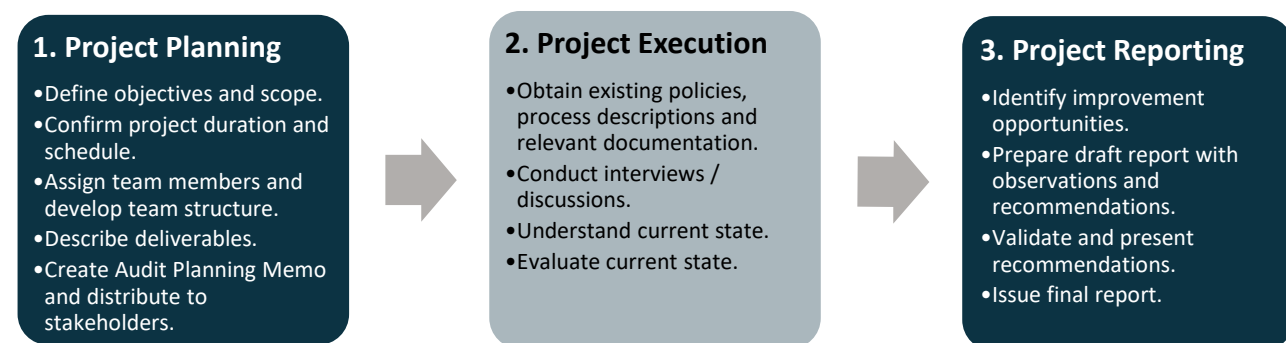
⁵ The Open Group Architecture Framework ("TOGAF") is a framework for enterprise architecture that provides an approach for designing, planning, implementing, and governing an enterprise information technology architecture.

⁶ The risk derived from the environment without the mitigating effects of internal controls; Institute of Internal Auditors.

- Records and information management processes do not comply with relevant by-laws and policies.
- Responses to requests for records under MFIPPA, from external stakeholders, or internal requests may be unreasonably delayed or incomplete due to records management systems, practices or processes.
- Employees may not receive training relating to records and information management or know where to access record schedules.
- Records and information management processes may not ensure the accuracy, integrity, confidentiality, reliability, and accessibility of data (unauthorized use or access, accidental disclosure, modification, or loss of data).

APPROACH

Based on MNP methodology, the high-level work plan for the audit included the following:



AUDIT TEAM

The audit was carried out by the following MNP team:

Geoff Rodrigues, Auditor General	Provided expertise in audit methodology, directed the MNP team in all stages of the audit, and ensured that firm and professional quality assurance standards were maintained.
Veronica Bila, Audit Delivery Partner	Oversaw all aspects of the engagement and reviewed audit results.
Hash Qureshi, Subject Matter Expert	Provided expert knowledge on information and records management during the audit process including planning, execution and reporting.
Michael Melville, Subject Matter Expert	
Chris Wu, Manager	Planned, managed and carried out audit procedures, involving the above resources as needed.
Osman Qureshi, Auditor	Carried out audit procedures.

STRENGTHS

In conducting the audit, MNP noted the following strengths with respect to the City's processes and controls in place over information and records management activities:

Records Management Software for Physical Records	The City utilizes Infolinx, a records management software, to track and manage the complete lifecycle of physical records and is administered by the Legislative Services & Communications Department. Infolinx is configured to ensure that selections (i.e. records series names, accountability, total retention period, disposition, and security classifications) made in the software are mapped to the requirements of the Record Classification and Retention By-Law 2017-151.
Formalized Data Readiness Assessments	The Information Technology Services Department has a formalized process for performing data readiness assessments for the Open Data program that focuses on data availability, data ownership, risk, corporate alignment, publication value, and technical considerations. In addition, data privacy assessments are performed on information sets before they are released to the public. This formalized process creates a strong foundation for data readiness assessments to be eventually applied to all data sets across the City.

SUMMARY OF OBSERVATIONS

To enable the City to set priorities in their action plans, we have reported our observations in one of three categories, "Low", "Medium" or "High" based on our assessment of the priority (i.e. significance, complexity, and resources required) of each observation.

Rating	Rating Description
Low (L)	The observation is not critical but should be addressed in the longer term to improve internal controls or process efficiency (i.e. 6 to 12 months).
Medium (M)	The observation should be addressed in the short to intermediate term to improve internal controls or process efficiency (i.e. 3 to 6 months).
High (H)	The observation should be given immediate attention due to the existence of a potentially significant internal control weakness or operational improvement opportunity (i.e. 0 to 3 months).

The table below provides a summary of our observations and recommendations, based on the rating scale outlined above. Detailed observations and recommendations can be found in **Appendix A**.

REF.	SUMMARY OF OBSERVATIONS AND RECOMMENDATIONS	RATING
1	<p>Information and Records Management Strategy and Program</p> <p>The City does not currently have an information and records management strategy and program. Without an information and records management strategy, the City will not have a defined path towards developing an information and records management program that ensures compliance with the By-Law.</p> <p>The City should develop and implement an information and records management strategy and program. The strategy and program must be endorsed and promoted by the Executive Leadership Team ("ELT") in order for it to successfully be adopted across the organization. The City can leverage its existing Policy and records retention schedule to develop a program that covers the governance structure, risk management processes, policies & procedures, training & awareness, roadmap and continuous improvement.</p>	M
2	<p>Information and Records Management Oversight and Monitoring</p> <p>There is little oversight of the departments within the scope of this audit on following the existing governance structure within the Corporate Records and Information Management Policy. Without regular monitoring and oversight, departments may not be complying to the Policy and related procedures.</p> <p>The City should reinforce the importance of the Policy by communicating the Policy to all departments and staff. A Records & Information Management ("RIM") Program Manager should be formally assigned within the Legislative Services & Communications Department. A Records Coordinator should be formally assigned within each department, with training provided and regular monitoring activities to assess the compliance with the Policy and related procedural manuals.</p> <p>Information and records management compliance topics should be regular agenda items (i.e. at least annually) in ELT meetings to ensure information and records management compliance is reviewed and discussed.</p>	M
3	<p>Compliance with Records Classification and Retention By-Law 2017-151</p> <p>The City utilizes Infolinx, a records management software, to track and manage the complete lifecycle of physical records. During our audit of the four in-scope departments, we found that the sample records tested within Infolinx all complied with the By-Law requirements. However, mechanisms were not in place to ensure that electronic records in the network shared drives, applications, and databases used to manage business activities are being monitored against the By-Law.</p>	M

REF.	SUMMARY OF OBSERVATIONS AND RECOMMENDATIONS	RATING
	<p>The requirements of the By-Law should apply to all records, both electronic and physical. Departments that do not meet the requirements compromise the City's compliance to legislative requirements.</p> <p>To augment the City's information and records management strategy and program (as described in Observation #1), a file and document management framework should ensure that official electronic records in the network shared drive, applications, and databases are separated from transitory records and that only official records are retained. The City should also explore opportunities to procure a records management system that can serve as a long-term records management software for both physical and electronic records.</p>	
4	<p>Information and Records Management Training</p> <p>Although information and records management training material is available on the City intranet, it was noted that some staff within the four in-scope departments were not familiar with the Corporate Records & Information Management Policy or the Records Classification and Retention By-Law 2017-151.</p> <p>Staff who are not aware of the Policy and the By-Law are less likely to comply with policies and procedures, which compromises the City's compliance to legislative requirements.</p> <p>Once the City has developed the information and records management program (as described in Observation #1), records management training should be provided to all employees. Records coordinators should receive additional and more comprehensive training as they should be the information and records management champions of their respective departments.</p>	M
5	<p>Freedom of Information ("FOI") Request Process</p> <p>The FOI request tracking system is not currently configured to provide staff with notifications/reminders of key legislative deadlines. Consequently, audit testing revealed that a sample of two out of 15 FOI requests did not meet legislative timelines. Without effective mechanisms in place to track the status of FOI requests, there is a risk that with the increasing volume of requests due to new legislation, the City will be challenged to meet legislative timing requirements.</p> <p>In addition, except for complex or high-profile requests, there is no review of FOI request documents for completeness and approval by Management before they are released to the requestor. Without secondary review and approval from Management, there is a risk that irrelevant, incomplete or incorrect information is provided to the requestor.</p> <p>The City should explore tools to automate the tracking of FOI requests in a single repository. As well, a review and approval of all records gathered for FOI requests should be performed before they are released to the requestor.</p>	L

RECOMMENDATIONS

The Auditor General recommends that:

1. The Information and Records Management Audit Report be received; and,
2. That staff be authorized and directed to do all things necessary to give effect to this resolution.

ACKNOWLEDGEMENTS

We would like to express our appreciation for the cooperation and efforts made by City staff whose contributions assisted in ensuring a successful engagement. City staff provided the Auditor General with unrestricted access to all activities, records, systems, and staff necessary to conduct this audit freely and objectively.

APPENDIX A: DETAILED OBSERVATIONS AND RECOMMENDATIONS

#	Observation	Rating	Recommendation	Management Response
1	<p>Information and Records Management Strategy and Program</p> <p>An information and records management strategy is a key artifact for a municipality's governance of records, generally outlining the necessary leadership, accountability and responsibility. It provides a long-term and enterprise-wide approach to managing a municipality's records across all operational environments.</p> <p>More specifically, an information and records management strategy identifies and explains:</p> <ul style="list-style-type: none"> the importance of information and records management to the municipality's operations (i.e. 'business enabling' capability to be delivered through records management); the responsibilities for information and records management; how the strategy aligns with applicable laws, standards, business plans and strategic requirements of the municipality; and, 	M	<p>An information and records management strategy and program should be developed and implemented, and endorsed and promoted by the ELT, for successful adoption across the organization.</p> <p>In developing the strategy, the City should begin with identifying the ideal information and records management environment (i.e. records assets, legislative compliance, data management, and privacy and security), documenting the directions taken so far, and identifying resources and technologies available to implement information and records management objectives.</p> <p>In order to be effective, the City's information and records management strategy should be aligned with other City strategies, objectives, risk management programs, and information technology initiatives.</p> <p>To develop and implement an information and records management</p>	<p>Management supports the Auditor General's recommendation to establish an information and records management strategy and program for the City in the future.</p> <p>The City is in the process of implementing several significant IT systems, including; replacement of the program registration system, replacement of the CRM system, new E-Ticketing and scheduling systems, and a new Enterprise Asset Management system.</p> <p>These projects will each require significant staff resources to implement and each will have some form of information management components contained within.</p> <p>As such, management believes it prudent to wait until these systems have been implemented prior to embarking on the creation of an Information and Records Management Program to govern all of Markham's information assets. As such, the City will build the information management model by taking a "bottom up" approach as each system comes on-line.</p> <p>Following implementation of the new systems and related information management</p>

#	Observation	Rating	Recommendation	Management Response
	<ul style="list-style-type: none"> how the strategy applies to all records in various formats and locations. <p>The City does not currently have an information and records management strategy, or a dedicated information and records management program. Driven by the strategy, an information and records management program entails the mobilization of resources and organization of processes to systematically control records throughout their lifecycle.</p> <p>It is our understanding that the City has stalled in the development its information and records management program due to the following reasons:</p> <ul style="list-style-type: none"> Low data management maturity within the City's electronic and physical information sets (e.g. abundance of duplicate and outdated records, limited metadata to support search & retrieval of unstructured data); and, Perceived resource capacity constraints in helping to advance the information and records management program. <p>In absence of an overarching strategy, mature information sets and dedicated roles, the City is not well-positioned to develop its information and records management program. For instance, the City will not be able to target and prioritize information</p>		<p>program, the City should consider including the following:</p> <ul style="list-style-type: none"> Governance Structure – Outlining leadership, organizational structures, and formal monitoring and reporting requirements. Risk Management - Understanding and prioritizing key risks of mismanaging different sets of records and evaluating their impacts. Policies and Procedures – Outlining the roles and responsibilities of City staff, steps for records classification, and secure & compliant processes for retention and destruction of records. Training & Awareness - Providing the methods and cadence for role-specific records management training. Roadmap – Implementing the program in a prioritized sequence, considering the dependencies and 	<p>components, the City will enhance its current information and records management practices by developing a program that will include:</p> <ul style="list-style-type: none"> An information management strategy A data governance model Policies and procedures Targeted priorities and dates to address the gaps identified in this audit report Identification of budget and resources required <p>This will provide a more sustainable approach to enhance the City's information and records management posture based on the level of risk tolerance deemed appropriate by the City.</p> <p>The Information and Records Management Program will be developed for senior management decision-making once the significant projects noted above have been implemented.</p> <p><u>Timeline to Implement:</u></p> <p>Q4 2022</p> <p>In the interim, the City will take steps to enhance its current information and records</p>

#	Observation	Rating	Recommendation	Management Response
	<p>and records management improvements across defined milestones and transitional states.</p> <p>As a result, the City is at risk of inefficient utilization of resources, as well as non-compliance to the legislative requirements of the By-Law.</p>		<p>impacts of other municipal IT and data projects/initiatives.</p> <ul style="list-style-type: none"> Continuous Improvement – Strategies for ongoing enhancement of processes and capabilities (e.g. goals and performance targets). <p>The City can leverage its existing Policy and records retention schedule (which contains some of the above elements) to develop a program that contains all key elements. For example, the existing Policy defines a clear governance structure (refer to Observation #2 below), which should be included in the City's program.</p>	<p>management practices through policy development and staff training.</p> <p><u>Timeline to Implement:</u></p> <p>Q1 2021</p> <p>Note: This timing may be delayed by the ongoing COVID-19 Pandemic.</p>
2	<p>Information and Records Management Oversight and Monitoring</p> <p>The City's Policy defines the governance structure and responsibilities associated with managing records in a transparent and accountable manner.</p> <p>As per the Policy:</p> <p>The Legislative Services & Communications Department has responsibility for:</p>	M	<p>The importance of the Policy should be reinforced by communicating it to all departments and staff. A RIM Program Manager should be formally assigned to the Legislative Services & Communication Department, and regular monitoring activities should take place to assess compliance with the Policy and related procedural manuals.</p>	<p>Management supports the Auditor General's recommendation.</p> <p>Communications will be sent to Directors and Performance Managers outlining City records management requirements. Records Coordinators will be designated in each Department to oversee the records management function and ensure compliance with the Records Classification and Retention By-law.</p>

#	Observation	Rating	Recommendation	Management Response
	<p><i>"Preparing and issuing management and quality control reports on the status of the Records & Information Management (RIM) Program and ensuring compliance with same throughout the City."</i></p> <p>City departments are required to have Records Coordinators responsible for:</p> <p><i>"Departmental implementation and maintenance of RIM policies and procedures and supporting department staff and participating in quality control compliance audits as required under the RIM Program Manager."</i></p> <p>During our audit, we found that the Legislative Services & Communication Department do not have a formally designated RIM Program Manager and do not create management/quality control reports on the status of the RIM program, and consequently compliance with the program is not being reported to the ELT.</p> <p>As well, it was noted that adherence to the Policy is not being monitored by the department Records Coordinators. Some Records Coordinators were not familiar with the contents of the Policy and were not aware that they had been formally designated as a Records Coordinator.</p> <p>Without regular monitoring and oversight, departments may not be complying with the Policy and related procedures.</p>		<p>A Records Coordinator should be formally assigned within each department, with training provided to help them understand their roles and responsibilities.</p> <p>Information and records management compliance reporting should be scheduled agenda items (i.e. at least annually) in ELT meetings to ensure information and records management compliance is reviewed and discussed at least once a year.</p> <p>Furthermore, the Records Coordinators should work with Management to schedule and document all planned information and records management activities at the beginning of each fiscal year. Activities should include:</p> <ul style="list-style-type: none"> • Assist in preparation of periodic department level records compliance audits (i.e. at least annually); • Periodic file clean-up and reviews of both physical records within the business areas and electronic records in the network shared drive; • Planned record transfers to offsite storage; 	<p>Additional work relative to this recommendation will be determined once the Information Management Program has been developed.</p> <p><u>Timeline to Implement:</u></p> <p>Q1 2021 - Designation of Records Coordinators</p> <p>Q2 2021 - Training of Records Coordinators to begin</p>

#	Observation	Rating	Recommendation	Management Response
			<ul style="list-style-type: none"> Review of file naming conventions for electronic records; Review of access to physical storage spaces and work with the IT department to ensure restricted access to the network shared drive; and, Training and awareness sessions. 	
3	<p>Compliance with the City's Records Classification and Retention By-Law 2017-151</p> <p>The City's Classification and Retention By-Law 2017-151 is the official policy for records management at the City and provides staff with the authority to manage records in accordance with relevant policies and legislation.</p> <p>The City utilizes Infolinx, a records management software, to track and manage the complete lifecycle of physical records. During our audit of the four in-scope departments, we found that the sample records tested within Infolinx complied with By-Law 2017-151 requirements (i.e. total retention periods, disposition, and security classification).</p> <p>However, for the four in-scope departments, mechanisms were not in place to ensure that records in the network shared drives, applications, and databases used to manage business activities are monitored against the By-Law. As such, departments</p>	M	<p>To augment the City's information and records management strategy and program (as described in Observation #1), a file and document management framework should ensure that official electronic records in the network shared drive, applications, and databases are separated from transitory records and that only official records are retained.</p> <p>The City should also explore opportunities to procure a records management system that can serve as a long-term records management software for both physical and electronic records.</p>	<p>Management supports the Auditor General's recommendation.</p> <p>Staff will undertake additional steps to ensure compliance with the City's current Records Classification and Retention By-Law. Staff will implement the tools and related processes identified in the Information and Records Management Program to further monitor compliance in both physical and electronic records.</p> <p><u>Timeline to Implement:</u></p> <p>Additional work related to this recommendation will be determined once the Information and Records Management Program has been developed.</p>

#	Observation	Rating	Recommendation	Management Response
	<p>may not be following the By-Law, which can compromise the City's compliance with legislative requirements.</p> <p>The records retention structure and classification requirements of the By-Law should apply to all records, both electronic and physical.</p>			
4	<p>Information and Records Management Training</p> <p>Although information and records management training material is available on the City intranet, we noted that Management staff within the four in-scope departments were not familiar with the Policy or the By-Law. Some departments noted that legislation and regulations specific to their business activities dictate different records management and retention practices, which they follow, rather than the By-Law.</p> <p>Staff who are not aware of the Policy and the By-Law are less likely to comply with policies and procedures which compromises the City's overall compliance with legislative requirements.</p>	M	<p>Once the City has developed the information and records management program which includes a training aspect (as described in Observation #1 above), information and records management training should be provided to all employees, including periodic refresher training (e.g. annually) and when updates are made to policies and procedures.</p> <p>Records Coordinators should also receive additional and more comprehensive training as they should be both the information and records management champions of their respective departments and the point of contact for department staff regarding compliance with policies and procedures.</p>	<p>Management supports the Auditor General's recommendation.</p> <p>Once Records Coordinators are identified by Department Directors, training sessions will be scheduled.</p> <p>Legislative Services staff will create a basic training package and make it available to all City staff.</p> <p>Additional training will be determined as part of the Information and Records Management Program.</p> <p><u>Timeline to implement:</u></p> <p>Q2 2021 - A training package will be made available to all City staff.</p>

#	Observation	Rating	Recommendation	Management Response
5	<p>Freedom of Information (FOI) Request Process</p> <p>Observations were noted for the two following areas:</p> <p>1) <u>Legislative Timelines</u></p> <p>Under the MFIPPA, the public has the right of access to information under the control of a municipality. Specifically, when a member of the public files a formal request for record, the City must ensure that:</p> <p><i>"...the head of the institution to which the request is made, shall, within thirty days after the request is received, and give written notice to the person who made the request as to whether or not access to the record or a part of it will be given."</i></p> <p>During our audit, in two out of 15 sample FOI requests tested, the City did not provide the requestor with a decision letter, outlining the final consideration of the request, within 30 days of receiving the application for access to records.</p> <p>If the City is not in adherence to the timelines set out in MFIPPA, then it compromises the City's compliance with legislative requirements.</p> <p>2) <u>FOI Request Tracking & Review Process</u></p> <p>FOI requests are handled by the Legislative Services & Communications Department. Data is inputted into Nordat, an electronic FOI request tracking system. The system is not currently configured to</p>	L	<p>Understanding that FOI Request volumes have increased year over year, the following considerations have been provided to improve efficiencies within the FOI request process.</p> <p><u>Legislative Timelines</u></p> <p>For continuous improvement, exploration of tools outside of Nordat, such as Microsoft Outlook calendar notifications or other system software, should be considered, to assist City staff in tracking and notifying when key legislative deadlines are approaching.</p> <p><u>FOI Request Tracking & Review Process</u></p> <p>For routine type FOI requests, the Legislative Services & Communication Department should ensure that a review is performed, and approval is obtained, of all records gathered before they are released to the requestor. The review should assess the completeness of the records and ensure that records are indexed in an organized manner. This would allow for continuous improvement of the effectiveness and efficiency of the FOI request handling process.</p>	<p>Management supports the Auditor General's recommendation.</p> <p>The Nordat system does not have the ability to send out emails or provide notifications about requests and memos that are due by a specific date. However, Legislative Services staff have set up reminder notifications within Outlook as part of the FOI procedure for inputting requests.</p> <p>Staff will also review the City's routine disclosure practices and revise the City's Routine Disclosure Policy accordingly.</p> <p><u>Timeline to implement:</u></p> <p>The Outlook reminders have been implemented.</p> <p>Q3 2021 - The review of routine disclosure practices and associated amendments to the Routine Disclosure Policy will be completed.</p>

#	Observation	Rating	Recommendation	Management Response
	<p>provide staff with notification/reminders of key legislative deadlines, which has resulted in staff tracking the status of FOI requests manually in a Microsoft Excel spreadsheet.</p> <p>Without effective mechanisms in place to track the status of FOI requests, there is a risk that with increasing volumes of requests due to increased public scrutiny and transparency, the City will be challenged to meet legislative requirements.</p> <p>In addition, with the exception of complex and high-profile FOI requests, there is no requirement for records to be reviewed and approved by the Manager of Privacy & Access before being provided to the requestor. Without secondary review and approval, there is a risk that irrelevant, incomplete or incorrect information is provided to the requestor.</p>			

A low-angle, upward-looking photograph of several modern skyscrapers. The buildings are covered in glass facades that reflect the clear blue sky. The perspective creates a sense of height and scale, with the buildings converging towards the top of the frame. The lighting is bright, suggesting a sunny day.

MNP