



Toronto Catholic District School Board
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Toronto Catholic District School Board

Records Retention Schedule Rollout Best Practices & Roadmap

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Table of Contents

Section	Title	Slide Number
1	Introduction, Background, and Benefits	3
2	Rollout Best Practices	7
3	Drivers and Pitfalls to Avoid	21
	Appendix: Helpful References	25

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1. Introduction, Background, and Benefits

Introduction

The Privacy and Information Management (PIM) Committee of the Ontario Association of School Business Officials (OASBO) developed a Generic Records Retention Schedule (GRRS) that is compliant with applicable laws and legislation. The GRRS is intended to provide suggestions with respect to how school boards should classify and maintain their records.

From our understanding the Toronto Catholic District School Board (TCDSB) would like to implement the GRRS across the organization and has asked KPMG to provide general best practices for its the rollout. This document intends to:



Identify records retention schedule rollout best practices to support the successful adoption of the GRRS; and



Provide a general roadmap that outlines the sequencing of best practices to aid in the planning and implementation of the GRRS.



Background and Current State - TCDSB

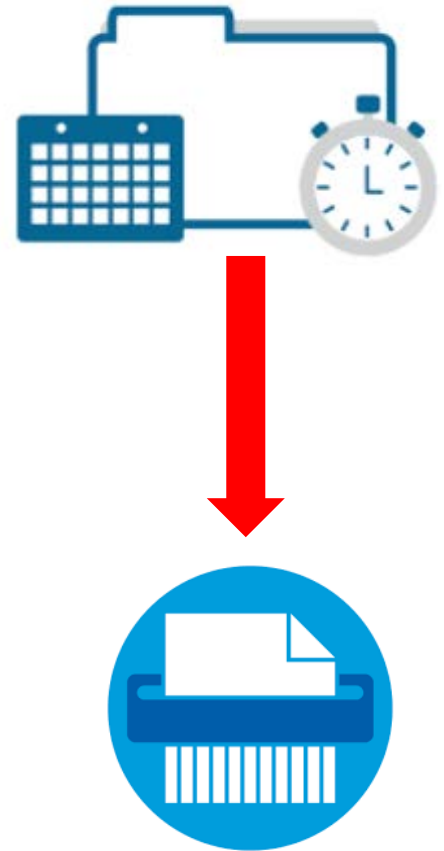
Background - Records Retention Schedule

A records retention schedule is a document that organizes an organization's records (both paper and electronic) in categories. A classification schema categories similar or "like" records into groups (i.e. "record series") to facilitate the consistent management of these records. The records retention schedule outlines all the record series in an organization and identifies who is accountable for the record series, how long they should be maintained, and how they are to be disposed.

Current State

The GRRS was recently published in May 2019 and has not been approved for implementation by the TCDSB. TCDSB does not currently apply retention periods/requirements to its records. Records are maintained indefinitely and routine disposition activities are not occurring.

Implementing an organization-wide records retention schedule would impact the way employees work and require changes to behaviors, business processes, and technology. A number of records management (RM) - related activities (i.e. best practices) need to occur in order to facilitate the adoption and implementation of the GRRS.



Benefits of Rolling Out The GRRS

Costs



Time



Quality



Compliance



- ✓ Controls the growth of records, the cost to manage redundant, obsolete and/or transitory information is reduced;
- ✓ Provides a standardized approach on how to classify and manage records;
- ✓ Reduces the time and effort required to search and retrieve information, resulting in greater operational efficiency and productivity;
- ✓ Reduces the risk to records quality and integrity, as authoritative (i.e. accurate and complete) records can be more easily identified;
- ✓ Improves litigation readiness and information requests processes as discovery activities are more easily managed; and
- ✓ Improves records management compliance, records are retained and disposed in accordance to legal/regulatory and business requirements.



2. Rollout Best Practices

GRRS Rollout

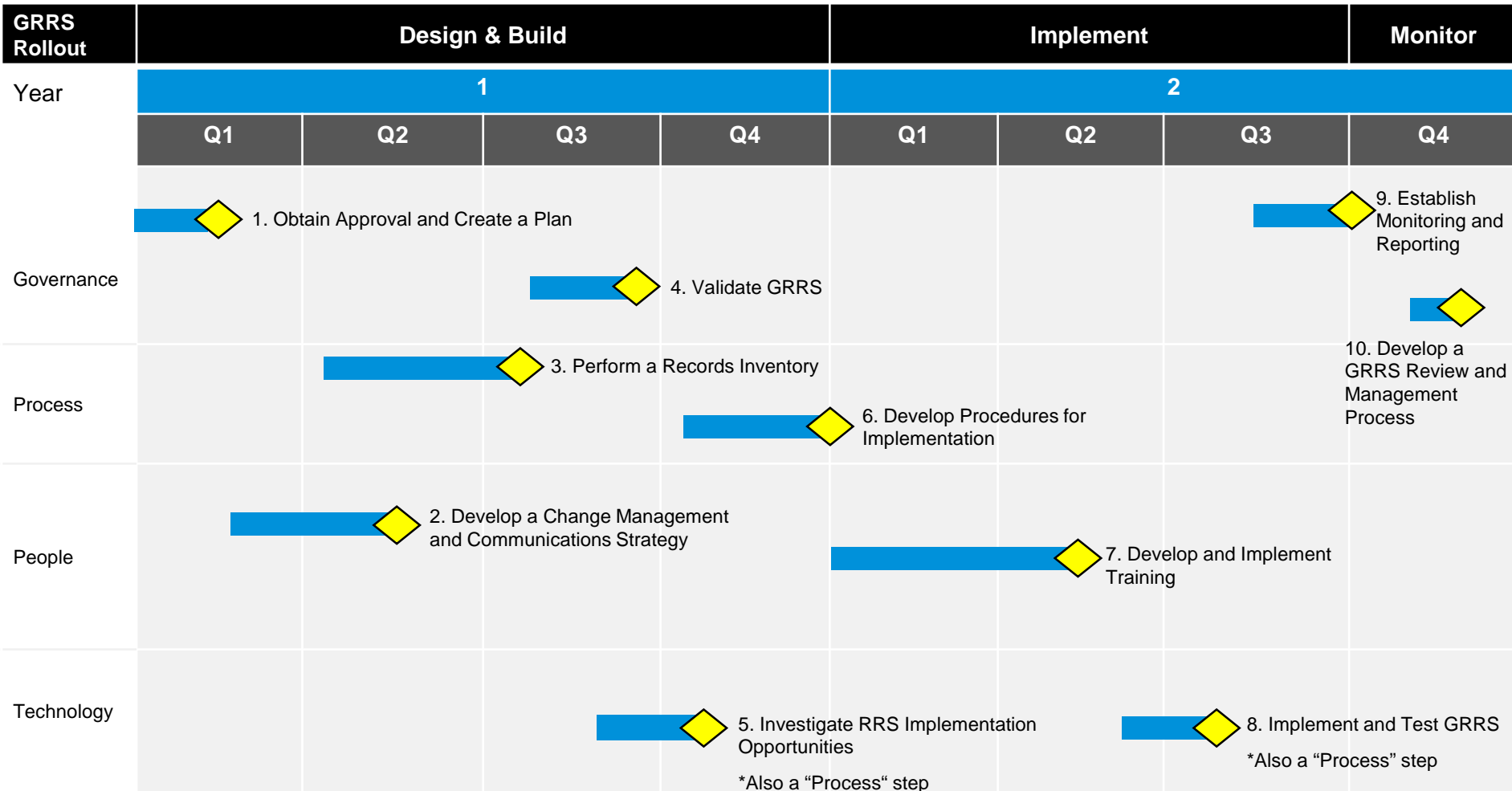
To better understand the current information environment at the TCDSB, KPMG performed a review of RM documents and gathered inputs (including suggested timelines to complete the rollout) from interviews with the Records Manager. Based on our analysis, industry best practices, and methods KPMG has observed from other organizations regarding records retention schedule implementation initiatives, we have provided 10 best practices TCDSB should consider to successfully rollout the GRRS across the school board. The best practices listed below are flexible, can be reorganized and may overlap (where applicable) depending on TCDSB resource availability, strategic direction, and commitment to specific activities.

Steps #	Best Practice	Steps #	Best Practice
1.	Obtain Approval and Create a Strategic Plan	6.	Develop Procedures for Implementation
2.	Develop a Change Management and Communications Strategy	7.	Develop and Implement Training
3.	Perform a Records Inventory	8.	Implement GRRS
4.	Validate GRRS	9.	Establish Monitoring and Reporting
5.	Investigate GRRS Implementation Opportunities	10.	Develop a GRRS Review and Management Process

Please see the following slides for more details.

Implementation Roadmap

A general roadmap has been created to illustrate the recommended 10 best practices, which have been further categorized into areas of a RM program (people, process, technology and governance). Please note the roadmap is not to scale and TCDSB should revise and align the roadmap to fit their organizational objectives, RM approach, and operational environment.



Step 1 - Obtain Approval and Create a Strategic Plan

Best Practice	Solicit executive/management approval to rollout the GRRS and be granted the authority needed to implement. Develop a strategic plan to rollout out the GRRS.
Estimated Time to Completion	2 Months
Summary	The appropriate approvals must be obtained prior to formally rolling out the GRRS. Formal acceptance and approval from executive/management teams is necessary to obtain the attention, full participation, commitment, and support from TCDSB departments, employees and stakeholders.
Tips / Considerations	<p>Some tips to consider at this stage include:</p> <ul style="list-style-type: none"> • Identifying an executive sponsor; • Creating a GRRS strategic plan, which includes scope, goals, deliverables, timeline, resources, risk and budget; • Presenting the GRRS strategic plan to the executive sponsor and senior level management to seek board-wide approval; • Presenting executives and management their responsibilities and involvement to ensure a successful GRRS rollout; and • Identify potential liabilities, gaps, and/or risks.

Step 2 - Develop a Change Management and Communications Strategy

Best Practice	Communicate TCDSB's intent to implement the GRRS to create awareness and achieve stakeholder buy-in.
Estimated Time to Completion	3 Months
Summary	Developing a change management and communications strategy for the rollout period (2 years) will ensure employees understand the purpose, goals and benefits of the GRRS. A change management and communications strategy will ready, prepare and help stakeholders make the proper organizational changes necessary to rollout and adopt the GRRS.
Tips / Considerations	<p>The change management and communications strategy should:</p> <ul style="list-style-type: none"> • Identify the roles and responsibilities of employees, teams and departments; • Identify communication and change timelines and key milestones; • Keep stakeholders informed of next steps; • Communicate and publish the draft GRRS and make it accessible to everyone at TCDSB; • Use multiple methods for communication and allow for feedback from all sources; and • Include leaders and/or senior management of each business department. These individuals typically deliver messages regarding GRRS business issues, reasons for change, and risk of not changing.

Step 3 – Perform a Records Inventory

Best Practice	Perform a records inventory to better understand the records being created, received and managed by TCDSB departments.
Estimated Time to Completion	4 Months
Summary	<p>Performing a records inventory will identify:</p> <ul style="list-style-type: none"> • What records are being produced and managed by each TCDSB department; • Where records are stored/located, • Who has access to records; • How records are currently being managed; • What records are vital/critical; and • Who owns the records.
Tips / Considerations	<p>Some tips to consider when performing a records inventory include:</p> <ul style="list-style-type: none"> • Identifying employees that have strong knowledge of the records produced by their departments; • Conducting in-person interviews with department employees to identify and list the records that they create, receive, and manage; and • Issuing a follow-up survey or email to capture any information and feedback that may have been missed during the in-person interviews.

Step 4 - Validate GRRS

Best Practice	Comparing TCDSB records to GRRS record series to identify commonalities and exceptions to make the necessary changes to the GRRS.
Estimated Time to Completion	2 Months
Summary	It is important to ensure the GRRS accurately reflects the current records created, received and managed by TCDSB departments. By comparing the records inventory to the GRRS, TCDSB will be able to validate the completeness of the record series identified in the GRRS.
Tips / Considerations	<p>Some of the activities to consider include:</p> <ul style="list-style-type: none"> • Appraising the records to assess their value (i.e. determine which are records and which are transitory items); • Reviewing and mapping the records identified in the records inventory against the GRRS and identify any records that can not be classified under the records series; • Revising or creating a new record series to accommodate TCDSB specific records and determine the appropriate retention period; <ul style="list-style-type: none"> *Note: retention periods are based on business needs and legal/regulatory requirements • Update the GRRS to include the new record series and associated information (i.e. record description, accountability, retention period and disposition method) and obtain the appropriate approvals to add/remove record series (i.e. Legal, business departments) from management departments; and • Publish revised GRRS.

Step 5 - Investigate RRS Implementation Opportunities



Best Practice	Identify and determine the ways in which retention periods/requirements can be applied to TCDSB records.
Estimated Time to Completion	2 Months
Summary	With both paper and electronic records being created and managed at TCDSB, an environmental analysis should be performed to identify opportunities and limitations in regards to GRRS implementation.
Tips / Considerations	<p>Some activities to consider include:</p> <ul style="list-style-type: none"> • Understanding manual and automated RM business processes, employee level of understanding of RM requirements, and overall information environment by engaging business departments to identify/map their business processes and data flows; • Understanding the strengths and limitations of current RM processes and systems of record; • Defining technology/system requirements to apply retention/disposition to records; • Identifying risk and compliance mandates for TCDSB (e.g. MFIPPA, PHIPA); • Identify if additional technology solutions are required to meet TCDSB's RM needs; and • Assessing the total cost of ownership and return on investment for each proposed implementation process/procedure and IT solution (such as faster search and retrieval, reduced storage costs, and reduced paper usage).

Step 6 - Develop Procedures for Implementation



Best Practice	Once GRRS implementation opportunities have been identified, TCDSB should draft retention and disposition procedures that outline each step of the process.
Estimated Time to Completion	3 Months
Summary	<p>Using the information gathered from the records inventory and environmental analysis the retention and disposition procedures should identify employee roles and responsibilities, approval processes, and verification measures (i.e. checking for legal holds).</p> <p>Once the procedures are complete ensure they are approved and maintained in a central location that is accessible to all employees.</p>
Tips / Considerations	<p>Some documents that TCDSB should develop to support the rollout of the GRRS include:</p> <ul style="list-style-type: none"> • Retention and Disposition Procedures (including associated records logs and approval forms); • Legal Hold Procedure; • Standard Naming Convention; • Recycling, Shredding, and E-Waste Disposal Procedure; and • IT solution specific procedures (if retention and disposition functionality is available).

Step 7 - Develop and Implement Training (1/2)



Best Practice	Develop and implement training for all employees to ensure they are able to comply with the RM policy, retention/disposition procedures, and their role in information security and privacy.
Estimated Time to Completion	6 Months
Summary	By equipping employees with RM knowledge and skills they will be able to execute retention and disposition activities and keep records secure and manageable in the future.
Tips / Considerations	<p>Below are some tips on how to create and what should be included in the training materials:</p> <ul style="list-style-type: none"> • Work with Human Resources, Legal, and risk/compliance teams to identify GRRS training goals, requirements, and processes to implement board-wide training; • Design a training program that meets the needs and culture of the organization. Some training options include: face-to-face meetings, virtual meetings, group seminars and webinars, train-the-trainer, knowledge transfer sessions, employee workbooks, and on demand online courses; • Creating instructional and quick reference materials to supplement the GRRS training; • Implement interactive skill-building exercises and use case scenarios for employees in the training materials; • Select a few subject matter experts (SMEs) from the front line employees to review training materials and provide feedback on areas of improvement; and • Implement suggestions made by SMEs to training where it makes sense to do so.

Step 7 - Develop and Implement Training (2/2)



<p>Best Practice</p>	<p>Develop and implement training for all employees to ensure they are able to comply with the RM policy, retention/disposition procedures, and their role in information security and privacy.</p>
<p>Tips / Considerations</p>	<p>After developing a robust training program and support materials, it is best practice to introduce it to employees for the first time in a training session that is either in-classroom or online. Some tips to implement training include:</p> <ul style="list-style-type: none"> • Conduct training of the RRS leveraging the training material/tools that were developed; • Ensure employees understand how to apply retention and disposition and protect TCDSB records; • Training should be part of the on-boarding process for new employees, with mandatory refresher-training sessions to be completed annually; and • TCDSB RM staff should stay current with records and information management best practices and refresh their own training on a regular basis by attending industry training sessions.

Step 8 - Implement and Test GRRS

Best Practice	A GRRS implementation plan should be created to appropriately sequence activities, allocate resources, and identify target timelines.
Estimated Time to Completion	2 Months
Summary	Implementing a records retention schedule is often a phased approach. In some instances where a RM technology tool is procured and time is needed for configuration and deployment, an organization may target select initial record series or types of records (i.e. paper, back-up tapes, select information systems) to implement the GRRS.
Tips / Considerations	<p>Some tips to support the implementation process include:</p> <ul style="list-style-type: none"> • Revising existing and/or implementing new records management procedures • If a RM technology solution is procured, work with a vendor to configure and install the RM technology solution • Selected SMEs, employees and departments to pilot GRRS procedures and/or the RM technology solution and provide feedback on the processes and solutions available to them to execute the GRRS. Testing includes identifying if: <ul style="list-style-type: none"> ○ Records are being classified/tagged appropriately ○ Records are disposed of correctly and permanently (including associated metadata, copies, back-ups and duplicates) ○ Auditability is enabled (retention/disposition logs, certificate of destruction) • Incorporate feedback from SME, employees and stakeholders to improve the GRRS procedures and RM technology.

Step 9 - Establish Monitoring and Reporting



Best Practice	Establish a monitoring and reporting process to ensure activities are executed as expected and continue to meet the needs of all TCDSB departments.
Estimated Time to Completion	2 Months
Summary	Developing a GRRS monitoring and reporting process will help identify if TCDSB employees and departments are complying with the retention requirements. If they are not, it may be an indication that the GRRS is not well understood or that that retention/disposition processes have not been implemented correctly or have changed.
Tips / Considerations	<p>Some items to consider when developing a GRRS monitoring and reporting process include:</p> <ul style="list-style-type: none"> • Schedule and perform GRRS audits or reviews; • Identify and establish metrics to support the monitoring and reporting of GRRS compliance and performance; and • Establish a remediation and follow-up process to manage identified gaps, improvement areas and/or non-compliance challenges.

Step 10 - Develop a GRRS Review and Management Process

Best Practice	Develop a GRRS review process and any changes are to be documented and approved.
Estimated Time to Completion	1 Month
Summary	Like many other governance documents the GRRS is dynamic and may need to be updated or revised in order to meet TCDSB objectives. The GRRS should be reviewed annually and is to be revised following any changes to regulatory requirements and/or if there are changes to the TCDSB business operations that require new recordkeeping requirements to be considered.
Tips / Considerations	<p>Any requested changes to the GRRS (e.g. add/removing a record series, change in retention period, modification to disposition activities) needs to be documented and approved by the records manager and appropriate stakeholders (i.e. Legal, business department(s), board/committee) prior to implementation.</p> <p>*Please note page 2 of the current OASBO GRRS document also offers high-level guidance and a checklist entitled “Records Retention Schedule Change Management,” that aims at capture any changes/modifications to the GRRS.</p>

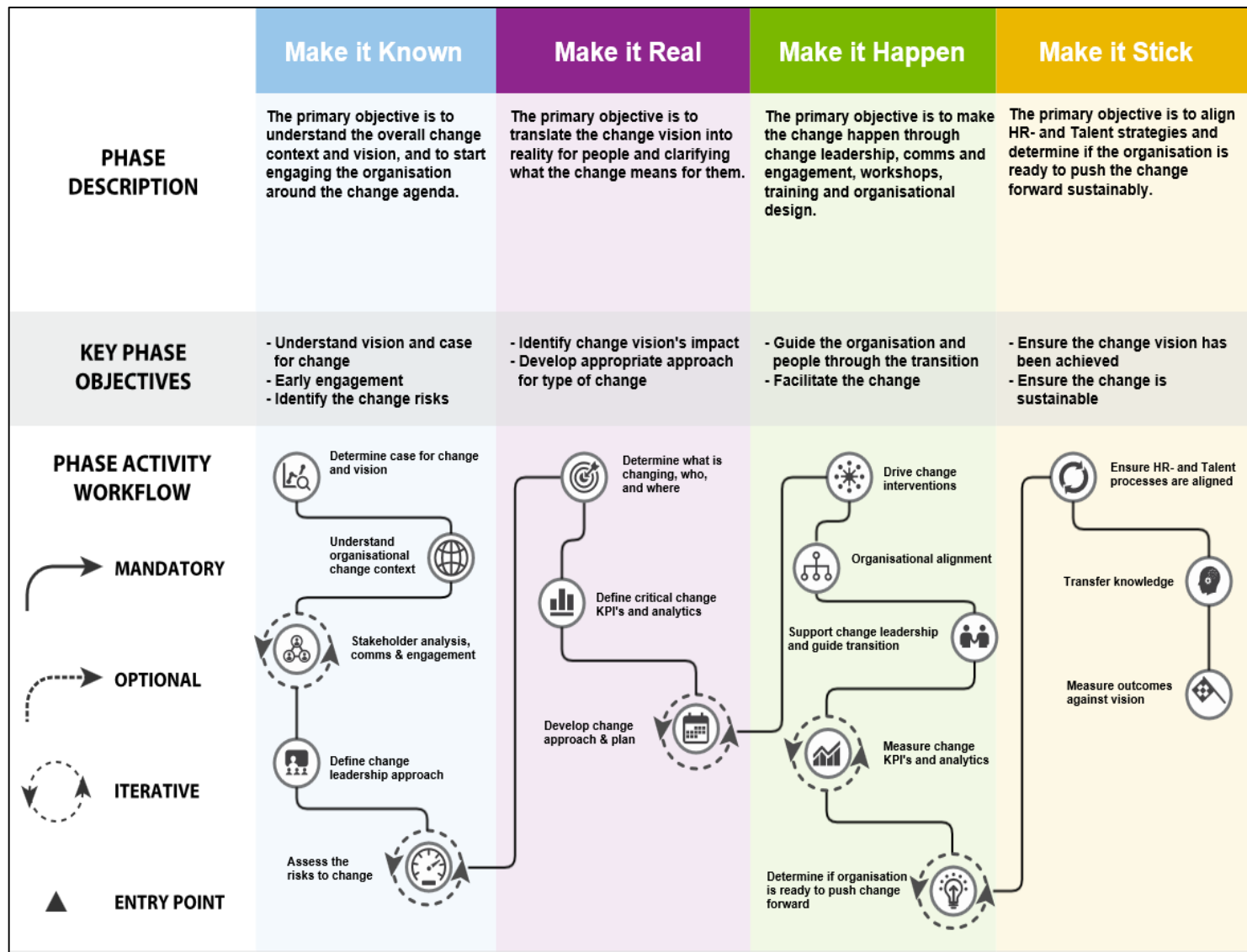


3. Key Driver and Pitfalls to Avoid

Key Driver - Change Management and Communication

Implementing the GRRS will change the way employees think, behave and work. Engaging employees early in the rollout process and having them participate in this change will be critical. An effective change management and communication strategy is essential to successfully roll out and adopt the GRRS. To help TCDSB understand a little more about the change management process, KPMG has provided its 4 phased approach on the next slide on how to make change known and how to make it stick.

Please see next slide.



Pitfalls to Avoid When Implementing the GRRS

When implementing the GRRS, the following pitfalls can be avoided:

- Concentrating on the technology and not the people;
- Poor coordination between the RM, IT, Legal and change teams;
- After gathering initial user feedback, not considering people issues or feedback too closely;
- Forgetting to involve the users (i.e. employee/SME) in the rollout process;
- Trying to move too quickly, gradual adoption turns a rollout into a learning process, rather than an immediate change;
- Not understanding the learning culture at TCDSB. The GRRS implementation and training should be aligned in the context of how adoption, learning and knowledge sharing works (and works well) within your organization; and
- Not maintaining accuracy of GRRS rollout project documentation and training materials as business requirements, timelines, and processes may change.



Appendix

Helpful References (1/2)

- <https://www.aiim.org/~media/AIIM-Real-Files/Toolkit-PDF/How-to-Develop-Records-Retention.pdf>
- <https://www.sfu.ca/archives/for-staff/RMtraining.html>
- <http://www.archives.gov.on.ca/en/recordkeeping/index.aspx>
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- https://www.prosci.com/resources/articles/change-management-communication-checklist?utm_source=tutorial-checklist-communication&utm_medium=redirect&utm_campaign=cm
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Helpful References (2/2)

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- https://www.armavi.org/docs/SmeadSoft_10Things.pdf



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