Review Article

Proposing A Commonwealth Information Management Framework

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Information Management Steering Committee, *Management of Government Information as a National Strategic Resource: Preliminary Report of the Information Management Steering Committee on Information Management in the Commonwealth Government, Draft for Comment,* October 1996 (at time of writing, available from the Office of Government Information Technology or at http://www.ogit.gov.au/imscrpt.html)

Information Management Steering Committee, *Architecture for Access to Government Information: Report of the IMSC Technical Group, Draft for Comment,* July 1996 (at time of writing, available from http://www.adfa.oz.au/DoD/imsc/imsctg/imsctg1a.htm - not http://www.adfa.oz.au/DoD/imsc/imsctg2a.htm as indicated in the main report).

These two documents are exposure drafts of reports prepared by the Commonwealth Government's Information Management Steering Committee (IMSC), and its Technical Group, respectively, to propose an overall framework for information management in the Commonwealth Government. The IMSC,

with representatives from about a dozen Commonwealth Government agencies, was established in December 1995 to replace the Information Exchange Steering Committee, perhaps best known to recordkeeping practitioners for its report, *Management of Electronic Documents in the Australian Public Service (1993)*, and guidelines, *Improving Electronic Document Management: Guidelines for Australian Government Agencies* (1995). The present reports have been prepared for submission to the Government Information Services Policy Board, a high level body which advises the Office of Government Information Technology (OGIT) on IT policy. The IMSC is chaired by Eric Wainwright, Deputy Director-General of the National Library of Australia, while the Technical Group is chaired by Dagmar Parer, a Director at the Australian Archives.

The draft of the main report was released for comment by the end of November 1996, after which it was to be finalised. Consequently the final version may be available (check the OGIT Web site) by the time readers see this review. The draft Technical Group report, while functioning as a supplement to the main report, was released in July 1996. Consequently, in some ways, the two suffer from the Technical Group report having been prepared outside the context of the main report.

The main report is a major work. The hard copy version extends to some 270 pages, of which two thirds comprise the executive summary and main text, the remainder consisting of appendices. The first part of the report sets the scene and the overall framework for the more specific discussion and recommendations elsewhere. Thus early chapters seek to establish a 'business case' for effective information management in Government, with emphasis on the role of the Internet for remote access, and describe a conceptual model for a Commonwealth Information Management Framework. Central from this point of view is a chapter which seeks to establish a framework of values in which government information management should be developed, in the form of a set of 'information service principles' (concerned with open government) and 'information management principles' (concerned with cost effective government).

In the following chapters the report moves into strategies for achieving the goals for information management identified in the report. I will return to these goals shortly. Some strategies are technologically based, others involve whole-of-Government policy, legislation and guidance, while others focus on implementation within Commonwealth Government agencies. At the technological level, there is a proposed architecture of access to information resources, including a whole-of-Government information management model, discussion of metadata and other

strategies for resource description, and discussion of key technical standards and strategies for managing them to support the other proposals. At the policy level, there is discussion of existing frameworks for international and national policy collaboration, in addition to collaboration across the Commonwealth Government, and proposals to promote active interaction between the Government and the public ('electronic democracy'). There is also a review of legislation relating to information management and some of the major issues involved. For implementation within agencies, there is discussion of the human resources and agency planning issues associated with the processes of change leading to information management reform.

The proposals described in the report are summarised in ten main recommendations, with 43 supporting initiatives. There are nine appendices providing further background and more detailed information, including references to other resources in print or on the World Wide Web. There is more information about the IMSC, a set of 'responses' from Commonwealth Government agencies performing whole-of-Government information management functions, describing their current and future roles, and a summary of current legislation relating to Commonwealth information management. The list of contact information and terms of reference of organisations involved in Commonwealth Government information management activity underscores the size of the task of coordinating its development. Beyond the Commonwealth Government, there is a list of the State Governments' information policy bodies, the home pages of those of selected overseas governments, the general entry point Web sites of Australian and overseas governments, and subscription details for electronic forums relating to government information management.

Reference material includes definitions of information management from a number of sources, lists of sources for information management standards, and a list of guides and other publications on Commonwealth information management. A combined glossary, a list of acronyms and Internet addresses of a wide range of organisations, and a bibliography with URLs complete the appendices. Throughout the HTML version of the report, in addition to the URLs proper, the names of many organisations and documents are hot linked to other World Wide Web pages.

The purpose of the Technical Group report is to address technical issues associated with making Commonwealth Government information resources, in any form, more 'visible' through descriptive metadata and providing seamless access to government information through the Internet. The report comprises an executive

summary, main text and seven appendices, including guidelines for information management planning, details of the US Government Information Locator Service (GILS) Core Elements and the Dublin Core (the two metadata standards initiatives supported in the report), a glossary and a bibliography.

From this description, the reader will already have gained some impression of the extraordinary scope of these documents and, in particular, of the main report. In addressing information management in the Commonwealth Government, this document takes the broadest possible view of *information*, which one would expect, and of *management*, which is more of a surprise. The stated goal is 'not simply "better management of information" but "better government" through improved information management policies and practices' (p. 3). Thus the report goes well beyond the notions of information management embodied in the definitions in the appendices to discuss with considerable insight and assurance a range of opportunities and issues associated with digital communications, the delivery of government services in an electronic environment, and the development of an 'electronic democracy' through public participation in policy formation. Sometimes the report goes farther than might perhaps be prudent, offering advice, for example, to the Department of Finance about the development of capital assets in a devolved financial management philosophy.

The report is very honest in a number of places, pulling no punches in descriptions of, for example, piecemeal approaches to information security across the Government, duplicated effort in the provision of whole-of-Government entry point services, the cataloguing of government publications and the tracking of changes in the structure of government, and lack of coordination in information management across Government generally and in such specific areas as the use of networks for remote access.

The report is wide ranging, comprehensive and very thoroughly researched. At the more familiar level of information management proper, there is a particularly clear and practical discussion of resource directory mechanisms and ways of achieving integrated access to information resources. This, and a number of other major sections, hold great interest for recordkeeping practitioners to the extent that records are an important species of information asset for any organisation, government or society. But records are more than that and, because much of what is discussed and recommended in these reports has profound implications for records and recordkeeping in the Commonwealth Government, it is legitimate for a review in a journal such as this to pay particular attention to these issues.

One of my first impressions of the main report was that the arguments advanced in relation to information management as a support for open government, and especially of accountability, are weakened by the lack of a recordkeeping perspective. In this discussion lies the perfect opportunity to exploit the role of records as evidence that is explicitly recognised in other parts of the report that address records management specifically. In the event the discussion is only about the people's right of access to government information. It is tempting, although perhaps unfair, to suspect that by constantly repeating the 'records are evidence' mantra, we have implanted the words, but not their full meaning, in the minds of our information management colleagues.

Much of the main report is founded on the ideological stance that has been summarised elsewhere as 'information wants to be free'. Thus, one of the basic objectives of the Commonwealth Information Management Framework is described as being to '. . . enable all Australians, from a convenient, affordable and transparent access point . . . to obtain access to *all public Commonwealth government information* . . .' (my emphasis). The other goal is to '. . . enable all Commonwealth employees . . . to obtain access to Commonwealth government information *to which they are authorised* . . .' (p. 3; my emphasis). One of the Information Service Principles is that: 'Government information is a national resource, and subject to privacy and security legislation and directives, agencies shall ensure that the information they hold is visible and that information of potential value to individuals, the private sector and other agencies is accessible' (p.31). One of the Information Management Principles is that: 'In developing systems for the organisation, transmission and transaction of information, agencies should start from the premise that, subject to privacy legislation, all information content will at some time be transferred across agency boundaries, and design access systems accordingly' (p. 35).

Thus, in essence, the report proceeds from the position that all government information, including all electronic documents, should be publicly accessible. The only exceptions admitted are the requirements of privacy protection and national security. There is no question in my mind that much more government information could and should be made available to the public at large and/or to individuals and organisations in their dealings with government. This represents a legitimate starting point for changing the culture and the rules concerning access to government information. The question is what the practical and moral limits, if any, should be. The paper world imposed practical limitations on this vision, but the electronic environment changes all that.

Taken literally, the consequences of such a policy, combined with the technology

which conceivably makes it feasible, would be to enable public access to all electronic documents and information systems, as long as they do not contain personal information or have a security classification. Does this mean that any citizen with a modem has a right to read a document that I created last week, yesterday or five seconds ago, or any electronic mail messages that I send or receive in the course of my employment, or drafts of documents distributed in my work group, no matter how rough or preliminary? In my view, 'Mad Dog' McLooney (founder of the Death to All Bureaucrats Party) has no more right to do this than he has to walk into my office, rifle through my desk or listen to my telephone calls. At heart this is why we have a 'thirty year rule' governing access to public records, regardless of whether this is the right amount of time or the best mechanism. Certainly there are better ways of achieving accountability through recordkeeping.

I recognise that I am taking the logical consequences of this ideological stance to an extreme, perhaps absurd, position. Perhaps its proponents will say that the scenario outlined above was never intended and that, of course, only documents intended to be made public will be. If that is the case, they should say so. My own response, should this position become implemented policy in my workplace, will be to include some sensitive personal information in every document I create, thereby exempting it from public access in my lifetime . . .

The Technical Group report brings us down to earth. A key recommendation is that '. . . agencies identify their information holdings needing to be made visible on-line and make descriptions of these resources available on the Internet, directly as Web documents or as records in an agency'. Thus the Technical Group's recommendations assume that only those documents that we want to make accessible (dare I say 'publish'?) will be made accessible. On this basis, 'Mad Dog' will not find my drafts unless I save them in HTML, upload them to our Web site and embed GILS Core metadata using the META tag. A combination of balanced policy and technology will enable this to happen much more readily than in the past. An extreme stance on public access to government information, on the other hand, risks alienating the senior managers across the Commonwealth bureaucracy whose support is crucial for the many progressive and desirable proposals in the report.

Another area of the main report that requires attention from the recordkeeping perspective is electronic messaging. The report, correctly, considers that major improvements in electronic messaging facilities for use between agencies and for transactions by the public and businesses with the government are essential for achieving the improvements in access and service delivery that are its fundamental

objectives. The exposition of what is required is thorough and practical. However, the discussion of the lack of 'formality' of electronic messages is confusing, as is discussion of their 'official' status or otherwise. The report cites 'uncertainty over the status of e-mail messages as records' (p. 99) as an issue to be addressed, yet notes nine pages later that '. . . the Australian Archives has also indicated to the IMSC that e-mail messages sent on agency e-mail systems are Commonwealth documents [sic] and are subject to all relevant legislation, including the FOI and Archives Acts'. Electronic messages are records in both law and logic, not merely because the Commonwealth's records authority says so. Taking a recordkeeping perspective in this part of the report would have made this clear.

A genuine attempt has been made in a number of places to integrate records (as a key information resource) and records management into the information management framework. A particularly welcome example is a discussion of the requirements of authority and reliability for those electronic documents which must function as records. Some reference to recognised sources of guidance on recordkeeping requirements, such as the work at the University of Pittsburgh or Part 3 of Australian Standard AS 4390, would have strengthened this section. Minor annoyances include confusing *recordkeeping systems* and *records management software* (even recordkeeping practitioners sometimes have trouble with this) and the notion that records are documents '. . . designated as records for evidential purposes. . .' (p. 107) and '. . . are created to account for the actions of an agency and the staff within that organisation' (p. 71). This is only part of the story and gives a misleadingly narrow impression of the role of records in organisations and society. Records serve purposes other than accountability. Documents that function as records do so whether anyone 'designates' it or not. The major thrust of electronic recordkeeping system design in the next five years will be to build systems that do not require people consciously to keep records at all. Once again, as used to happen in the paper world, records will be generated as a by-product of business activity.

A clear conception of what records are is not helped by the report's use of a definition of a record which, while otherwise admirable, specifies that '. . . to be considered as evidence, a record must . . . be part of a recordkeeping system' (p. 261). This definition has appeared in some Australian Archives publications where, similarly, it gives the impression that a record is not really a record if it is not part of a recordkeeping system. Employees looking for excuses to keep electronic records out of formal control or to dispose of them as they like will find comfort in this: 'it wasn't in a recordkeeping system, so it wasn't a record'. Records ought to be managed in recordkeeping systems *because they are records*. On the plus

side, the report commends the Australian Archives' work on electronic recordkeeping and tactfully recommends '. . . a more visible process of promulgating the work through simple guides and training . . .' (p. 124), an exhortation which could apply to any government records authority, including my own.

One of the more delicate issues in the relationship between records management and information management is how the one relates to the other in organisational terms, particularly in organisational structure and in mechanisms for planning and managing organisational programs. An assumption that records are merely a type of information resource, increasingly indistinct from other such resources in the electronic environment, informs the main report's comments about removing the traditional divide between records management, information technology, library and other information related areas. Certainly records management needs to get out of 'Admin' but is the information management area, assuming there is a consolidated one, the only place to go? In New South Wales we have argued in a draft *Standard on Records Management Programs* that the 'corporate governance' and accountability oriented areas (legal, audit) are equally valid. Records management is about more than managing information.

The main report recommends that agencies be requested to produce Corporate Information Management Plans, which are introduced as an extension of IT plans which are already required (p. 147). This is presumably a tactic to keep the IT managers on side: it is better than saying that IT plans should be replaced by information management ones. But do we really want recordkeeping to be managed within a planning framework designed for IT? There is much to be done to ensure effective recordkeeping in government agencies that has little to do with IT or the primary thrust of information management. A recordkeeping culture is needed, regardless of the technological environment.

It is worth noting that Information Management Plans were an important part of what might be regarded as the Australian Archives' 'second generation' approach to electronic records management (if we count 1995's *Keeping Electronic Records* as the third generation). It is not clear if it ever became common practice for agencies to produce such plans under this approach. There is no doubt that an integrated approach to information management requires an integrated approach to its planning. Again, in New South Wales, we see an identifiable *records management* program and planning structure as an essential part of managing records effectively across an organisation.

Similarly the recommendations arguing for information retrieval tools providing

integrated, seamless access to information resources, including records, deserve the strongest support. But when it is records, capable of functioning effectively as evidence, that people need, they must be able to retrieve records.

A strong area of both reports, with particular interest for recordkeeping practitioners, is metadata. Metadata standards are explained clearly and given a prominent place in both reports' recommendations for the description of information resources. The focus is on metadata for retrieval, rather than for management of the resource, which needs to be borne in mind when identifying metadata requirements for electronic records and the means of satisfying them.

The main report's assertion that the focus of the Commonwealth Record Series (CRS) system, as a metadata scheme, is at series or item level (p. 73) ignores the role of provenance information as metadata for records, while the Technical Group report notes the need for metadata about administrative change and the Australian Archives' part in documenting it. Other implementations of the series system are using functional context as a structural element, adding another dimension to provenance in this metadata role.

There is some tantalising, though in some ways disappointing, material on functions as an element in description of information resources. The main report recommends 'functional entry points', identifying the functions exercised by agencies over time as part of the Whole-of-Government Entry Point, and recommends the use of a common thesaurus of core terms for records management - which is based on functional analysis, not subjects - but fails to make the connection between the two. Moreover, despite recommendations for coordination of information management between governments, there is no discussion of an entry point via the combined functions of Commonwealth, State/Territory and local governments. This is something that Australia's government archives, at least, ought to be able to achieve through common approaches to functions in descriptive practice and on-line finding aids.

The Technical Group report proposes the building of a retrieval tool for accessing information resources by business functions of government agencies as part of Phase 2 of its Preliminary Implementation Model. Of particular interest to archivists, this proposal is, unfortunately, outlined only in the barest way.

These reports, especially the main report, are impressive pieces of work and thought-provoking, indeed challenging, for anyone working in the information disciplines. On this basis I commend them. At the same time, they raise more

questions for recordkeeping practitioners than they answer. The challenge for recordkeeping practitioners working in the Commonwealth Government, and for all of us who collaborate with them, will be to establish clearly and satisfactorily the place of records and the recordkeeping discipline in this broad vision for information management.