

# IM Aware

## Information Controllers

Thanks for tuning in.  
The Live Event will begin shortly!

Ask questions using the Q&A function.

Your microphone is automatically muted.

Your camera will not be in use.

Turn your audio up to ensure you can hear the presenter.



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# Director Update



IM Aware June 2024

Dan Arnold, Director IM Programs  
Enterprise Content Management Branch  
Data and Content Management Division



# Organizational Update

- Enterprise Content Management has a new ED – Roberta Flis.
- Background in GoA, commissions, boards, and private sector working with data-driven IT and business projects.
- Started with IM Programs on April 8.



# April was RIM Month

- To see the updates please visit our Data and Content Management website at:

[Welcome to RIM Month-2024](#)





# Content Inventory Updates

- On track to have completed over 600 CI's by end of June.
- Working with Education, Jobs Economy and Trade, and Transportation and Economic Corridors this Quarter
- Engaging with Arts Culture and Status of Women, Justice, and Executive Council in Q2.
- Work is progressing with the BAR system.



# SPO Toolkit Development

- We recognize that designing SharePoint to be effective can be tricky.
- Pulled together a SPO Adoption Task Team including members from Content and Collaboration Services, IM Programs, Content Management Operations, Active File Management, IT Training Services, Productivity Technology Services, and Health.
- Building a toolkit designed to help effectivity build and use SPO to maximize effectiveness and remain complaint to RM policies.



## Information Controller Training



<https://pixlr.com/>

PROMPT: Create an image of someone making a critical decision over a document



# Thanks

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Unless otherwise quoted, all photos from <https://unsplash.com/>

Alberta

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# Information Controllers

The role and its responsibilities

Erin Zybart, Director, Information Management Projects

June 11, 2024



# Agenda



The Role of the Information Controller



Other Roles



Assuming the Role



Case Studies



Questions

# The Role of the Information Controller

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What is an information controller and what do they do?

# How it started...

- The concept of certain individuals or roles having power over records is not a new one and can be found in the 1968 Alberta Rules of Court, for example.
- From 1973-1995, the deputy head of each department was required to appoint a records officer to oversee the management of the department's records.
- Since 1995, the Records Management Regulation states that each deputy head is responsible for the management of records in the custody or control of their department.

# How it's going...

- Even though it was not required after 1995, the custom of assigning departmental Senior Records Officers (SROs) persisted.
- Between 2018 and 2023, the role of the SRO was greatly diminished due to centralization of information management (IM) services in Service Alberta and then in Technology and Innovation.
- Currently, only Health, Mental Health and Addictions, and ABCs still have SROs.



# What is an information controller?

- An information controller has the responsibility and decision-making authority for assigned collections of information, including (but not limited to) regulating and administering use, disclosure, and/or disposition of information.
  - [Information Controller and Information Custodian Directive](#)  
(2021)

# Who is an information controller?

- The Records Management Regulation states that the deputy head of a department is responsible for the records in the custody or under the control of the department.
- The deputy head of a department is designated as the information controller of a department's content.
  - [Content Management Policy](#) (2022)

# Responsibilities

- Approving Security Threat and Risk Assessments (STRAs), other risk assessments, and risk acceptance documents.
- Authorizing the sharing of personal information where permitted.
- Ensuring legal holds on department records are enforced.
- Approving records digitization projects/programs.
- Approving content migration plans.
- Identifying records to withdraw from scheduled destruction.
- Ensuring that the appropriate security classification is applied to data and information.
- Ensuring content inventories are created and maintained.
- And more!

# Assigning the role

- Deputy heads will assign the role of information controller as required.
  - [Content Management Policy](#) (2022)
- Responsibility, but not accountability, for information may be assigned by the deputy head to another party but assignment of responsibility must be documented.
  - [Information Controller and Information Custodian Directive](#) (2021)

# Assignment practices

- When a deputy head assigns the role of information controller, it is recommended that they do so to a position, not an individual person.
- The deputy head may choose to assign the role to all positions at a certain level of the department (e.g. all Executive Directors) or to positions at various levels based on organizational requirements.

# Determining the information controller

- Control is determined based on who has the authority or responsibility for creating and/or collecting the information in order to perform business activities.
  - If a department, deputy head, or group or role within a department is accountable for a business activity, then the deputy head is the default information controller for the records of that business activity.
  - Accountability for a business activity is determined through an analysis of legislation, policy, and other applicable authorities (e.g. agreements, terms of reference).



# Example 1: Corporate Income Tax

- Treasury Board and Finance is responsible for administering the *Corporate Tax Act*.
- Therefore, the Deputy Minister of TBF is the default information controller of records of the process of collecting corporate income tax.

## Example 2: Human Resources

- The *Public Service Act* states that each deputy head is responsible for managing the attendance, conduct and work performance of the employees in their department.
  - Therefore, many HR records are under the control of the employing department, including hybrid work agreements, performance reviews, and recruitment records.
  - Public Service Commission has control over the records of the execution of the Public Service Commissioner's responsibilities as per the *Public Service Act*.

# Other Roles

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Who else is responsible for managing information?

# Information Custodian

- Information custodians have the responsibility for maintaining and/or administering the systems and/or applications in which information is managed without having responsibility for the information itself.
  - [Information Controller and Information Custodian Directive](#) (2021)

# Examples of information custodians

- Information custodians may be:
  - Employees and contractors that manage program records,
  - File room staff,
  - Employees and contractors that maintain and/or administer the IT systems that store and/or manage information,
  - Contracted records storage providers such as Iron Mountain and cloud storage service providers,
  - Vendors and contracted service providers that create or collect records on a department's behalf.

# Information custodian responsibilities

- Information custodians are responsible for:
  - Implementing information management decisions made by the information controller,
  - Acting in compliance with Government of Alberta information management policy instruments, and
  - Reporting risks and issues to the information controller.



# Example: The Bank



BANK

It's your money...

## Controller (You)

- Tell them what to do with your money: invest, just hold, put in a safe deposit box, etc.
- Have expectations on security and who can access your money.
- Can authorize other people to access an account.
- Can use it as you see fit, and even remove it from the bank if you want.

## Custodian (Bank)

- Provides certain services that you can decide to use (or not).
- Design security, access controls, provides access cards, software for reporting, investment support, etc.
- Have specific processes in place to enable/disable access to your account.
- Have **no** say in what you do with your money.

# Core controllers

- Some applications store and/or manage data that is under the control of multiple departments (e.g. 1GX).
- Deputy heads may assign responsibility for the information managed within such shared systems to another deputy head – a “core controller”.
  - Core controllers should still consult with other deputy heads or other Information Controllers as needed when making decisions that will affect other departments.

# Business Owner

- Responsible for making business and financial decisions about an application and *may or may not* be the information controller of the information stored in the application.
  - For example, the Business Owner of ARTS is the Executive Director of ECM branch in T&I, but each department has control over its records in ARTS.
- If changes to an application will affect how information is managed in/by the application, the Business Owner should consult with the applicable information controller(s).

# Technology and Innovation (TI)

## Technical Teams\*

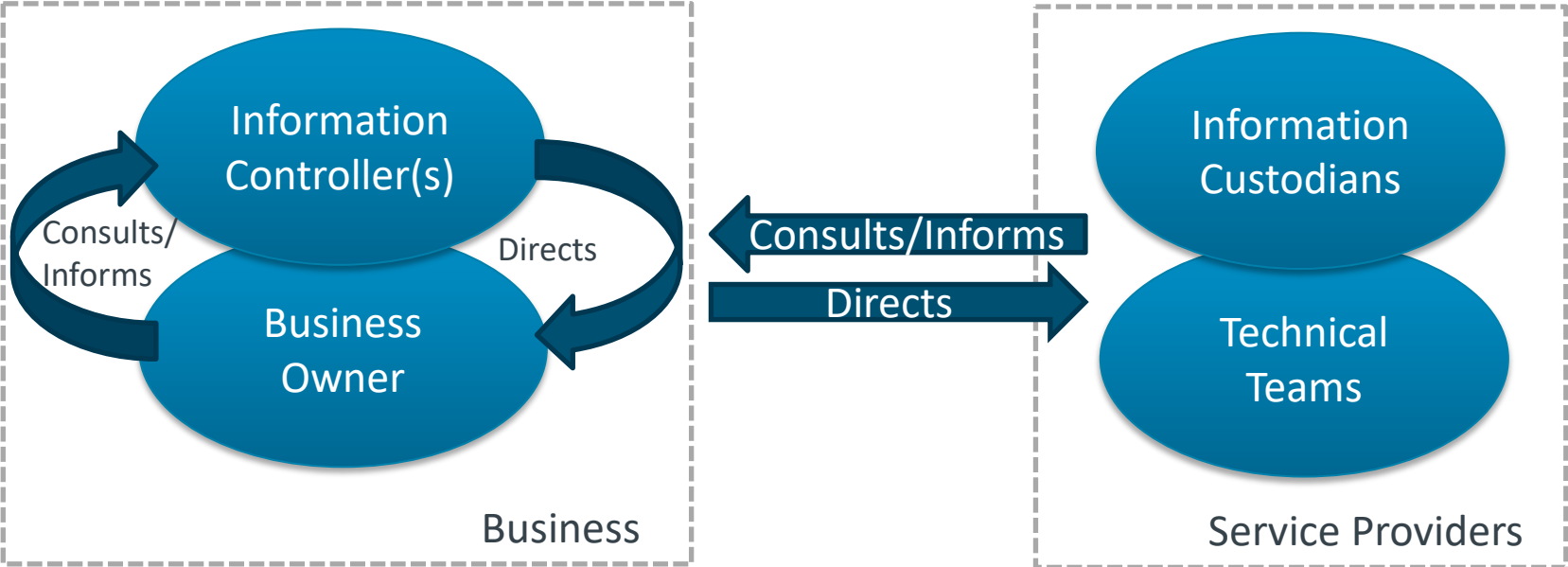
- Responsible for ensuring an IT application is maintained and supported and incidents are addressed.
- Implements changes to the application as directed by the business owner and/or information controller.
- Is generally also the information custodian of the information stored in and/or managed by the application.

\*There are several roles in TI that all support IT applications, products and services in different ways.

# Data Roles

- Department Data Executive
  - Functions as the information controller responsible for data collections in the custody and/or under the control of a department.
- (Department) Data Steward
  - Functions as the information custodian for a data collection.
- See the [Data Management Roles Directive](#) for more information.





# Line of Business Application

Role	Who
Information Controller	Program Head
Information Custodian	Technical Team
Business Owner	Program Head

In this situation, all information in the application was created and collected for and by a single program.

# Shared Systems (ARTS)

Role	Who
Information Controller	Department
Information Custodian	BTO branch in T&I
Business Owner	Executive Director of ECM branch in T&I

In this case, information in the application was created and collected for and by multiple departments.

# Self-Service Products (SharePoint Sites)

Role	Who
Information Controller	Program Head
Information Custodian	Site Owners group
Business Owner	Program Head

Program staff are responsible for configuring, maintaining, and managing access to the site and its contents.

# Assuming the Role

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How to take up the information controller's responsibilities and who can help.

# So, you're an information controller...

1. Understand the scope of your role
2. Learn about your responsibilities
3. Become familiar with the current state
4. Address any issues
5. Make decisions as needed
6. Maintain awareness
7. Transfer knowledge

# Subject matter experts

- Information Management
  - Can advise on policies and best practices for the creation, collection, organization, classification, storage, retention and disposition of information in all formats and on digitization of hardcopy records.
- Privacy Services
  - Can advise on the collection, use, and disclosure of personal information
- Data Centre of Excellence
  - Can advise on data management, data analytics, and related solutions

# More subject matter experts

- eDiscovery Services
  - Can advise on the status of legal holds on records and on best practices for implementing, maintaining and lifting holds
- Legal Services
  - May be consulted on legal aspects of information management, including the scope of specific legal holds
- FOIP Operations Services
  - Can advise on the status of FOIP holds on records



# Even more subject matter experts

- Cybersecurity Services
  - Can advise on information security matters relating to digital information and data
- Engagement Leads
  - Can advise on appropriate IT solutions for specific business issues and requirements

# Case Studies

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Some decisions an information controller may be called upon to make.

# Security classification

- Data and Information Security Classification (DISC) is determined by both content and context and can be dynamic.
- Information controllers should ensure that all staff that will be classifying records understand security classification in general and any requirements and considerations specific to the information they have access to.
- Consult with: IM Programs

# Records destruction

- Records retention and disposition schedules are legal authorities that dictate how long records must be retained and how they are to be dispositioned.
- Information controllers must determine whether there is a requirement to retain the records that supersedes a schedule.
  - This is generally limited to legal and FOIP holds.
- When records have met their retention period and are eligible for destruction, the information controller will be sent a destruction notice to sign and, if applicable, to note any records that are subject to a hold and should be held back from disposition.
- Consult: Litigation hold list, eDiscovery Services, FOIP Operations

# Records digitization

- Digitizing (scanning/imaging) hardcopy records and disposing of the source records requires that the digitization process be rigorous, auditable, and compliant with applicable standards.
  - Otherwise, the resulting electronic records may not meet the requirements of the Alberta Evidence Act.
- The information controller is required to authorize records digitization activities prior to their commencement by approving a Digitization Procedures Manual.
- Consult with: IM Programs

# Final Thoughts

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# Takeaways

- Records are the primary evidence of and output of government activities – managing records of government information is no small task and a very important one.
- There are a multitude of groups, individuals, and service providers to support information controllers and all Government of Alberta staff – just reach out!

# Questions?

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# The Information Controller, Information Custodian, & the Gatekeeper.

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## *Roles and Responsibilities from the Cybersecurity Perspective*

Technology & Innovation  
Cybersecurity Services Division

*Presented By: Benjamin Uduka, ISO, Cybersecurity Risk Management*  
June 11, 2024



# Topics

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Background



The Role of the Information Controller in Cybersecurity



The Delegated and Supporting Roles



Final Thoughts



Questions

# Background

The Government of Alberta's (GoA's) vision of Alberta's cyberspace is one that supports secure, safe and resilient systems while protecting privacy by design: a cyberspace that we can use with confidence to serve Albertans.

The deputy head of a department is ultimately accountable for the information and systems/applications in their custody and/or under the control of their department

*Cybersecurity services within the GoA takes a risk-based approach:*



# The Role of the Information Controller in Cybersecurity

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*What is information controller in cybersecurity and what do they do?*

# The Information Controller

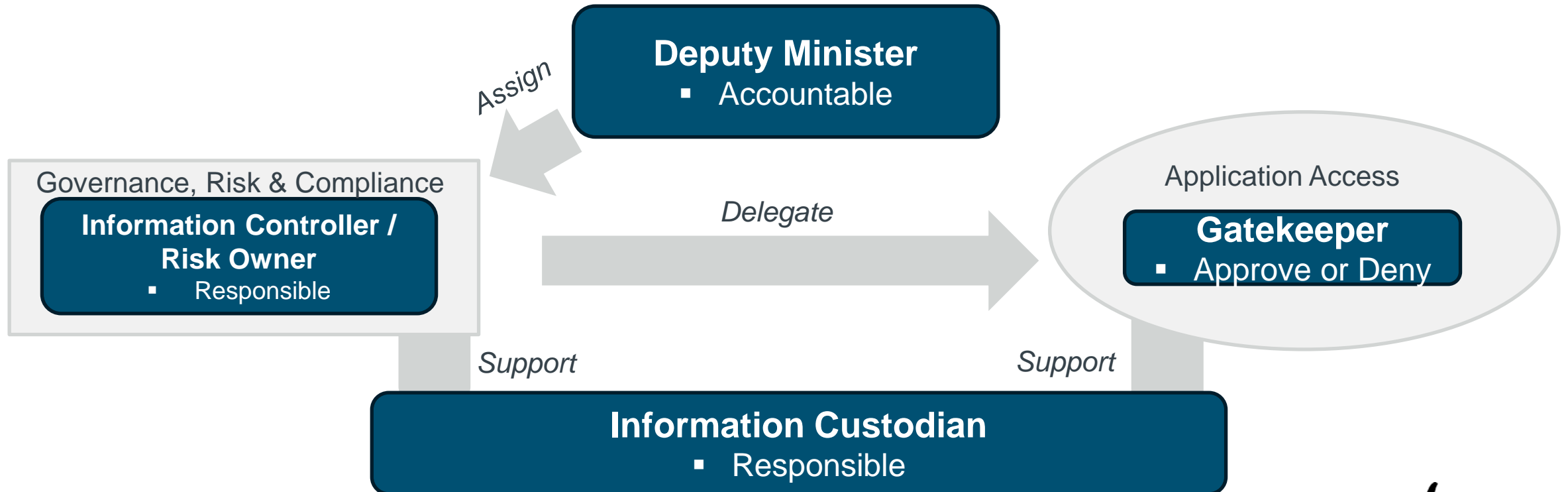
Cybersecurity Services considers the Information Controller as:

- A key role in Information Technology (IT) governance responsible for all assigned applications, data, and services.
- Decision-making authority with knowledge of the impacts of a loss of confidentiality, integrity, and availability (CIA) for their digital assets.
- The risk owner for their assigned digital information and data assets.

The Deputy Minister is accountable and can assign the role of the Information Controller.

## Role Assignment, Delegation, and Support

- The role and responsibility (but not accountability) of the Information Controller is assigned by the deputy head (e.g., deputy minister).
- Role assignment is documented, and the Information Controller is given **decision making authority** (e.g., assistant deputy head, program executive, director, etc).



# Information Controller Cybersecurity Responsibilities

- Ensuring that security requirements are established for their assigned information, systems and/or applications.
- Understanding the information classification and business impacts of data loss on systems or applications assigned to them.
- Initiating control reviews for their assigned digital assets
- Ensuring remediation of control deficiencies found with control activities.
- Ensuring regular review of access permissions to their applications and data.

## Information Controller Cybersecurity Risk Management Responsibilities

- Cybersecurity Risk Management work with the Information Controller to properly identify, track, and manage risks to digital assets (applications or services) .
- Risks are identified in the Security Threat and Risk Assessment (STRA), or Statement of Acceptable Risk (SoAR), and signed off by the Information Controller.

### **Information Controllers are responsible for:**

- Accepting risks and treatment plans by signing off risk assessment(s) on their assigned system or application within their department.
- Ensuring that appropriate controls and countermeasures are in place to protect the system or application from threats.
- Risk Register monthly review and update on the risk(s) assigned to them as risk owners.



# The Delegated and Supporting Roles

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*Who supports the information controller in cybersecurity?*

# The Gatekeeper

- The Gatekeeper is a delegated role assigned by the Information Controller to one or more applications, with the responsibility to approve or deny access to applications and the data collected, processed, stored, and transmitted.
- The Gatekeeper acts on behalf of the Information Controller and works with the Information Custodian to complete application access control reviews.

**Gatekeepers are responsible for:**

Approving or denying access to their assigned applications.

# The Information Custodian

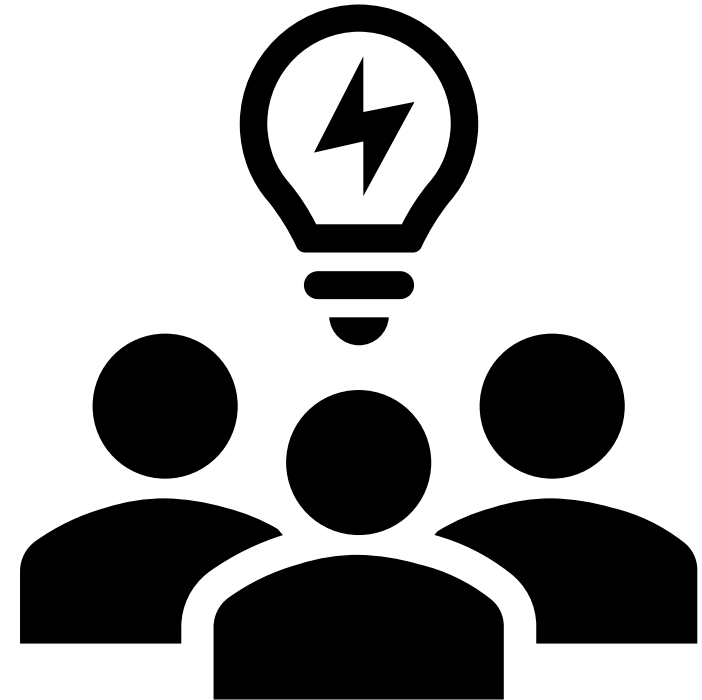
- The Information Custodian is a technical role that maintains and/or administers the systems or applications, and data on behalf of the GoA.
- Information is managed by applying security controls and countermeasures that protect information and data.

## Information Custodians are responsible for

- Implementing security controls required by the business for information and information technology (IT) systems as defined by the Information Controller.
- Maintaining and/or administering the systems and/or applications in which information is processed without having responsibility for the information itself.

# Final Thoughts...

- The Government of Alberta's Cybersecurity Services takes a risk-based approach to protect digital information, applications, and services
- The Information Controllers, the Gatekeepers, and the Information Custodians work in collaboration and support with Cybersecurity Services to achieve this vision.



# Questions?

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# IM Aware

## Information Controllers

Thanks for tuning in.

To join our mailing list email:

[goa.informationmanagement@gov.ab.ca](mailto:goa.informationmanagement@gov.ab.ca)

