Title: Case Study 10(2b) – Simon Fraser University Human Rights Office: Policies, Procedures and Tools for E-mail Management and Preservation in an Administrative Unit

Case Study Report

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Case Study Report

A. Overview

In February 2011, the Human Rights Office (HRO) at Simon Fraser University (SFU) withdrew as part of the tri-university study of e-mail management and preservation studies for the InterPARES 3 Project (IP3). The other test-beds originally participating in this study were the Office of the University Secretary (USEC) at the University of Victoria (UVic) and the School of Music at the University of British Columbia (UBC). The tri-university case study was designed to examine three different contexts common to all universities. UVic would examine e-mail management in a governance unit, UBC in an academic unit, and SFU in an administrative support unit.

The main objectives of the HRO case study were to create resources that support and facilitate the:

- effective management of e-mail records by their creator for on-going administrative, legal, fiscal, and audit purposes;
- appraisal, identification and selection of e-mail records of enduring value;
- long-term preservation of authentic and reliable e-mail records selected for permanent preservation; and
- provision of access to e-mail records selected for permanent retention.

This report outlines the HRO’s involvement with IP3 and offers reasons this case study did not accomplish its objectives as a test-bed.

B. Statement of Methodology

The Graduate Research Assistants (GRAs) worked closely with SFU’s Archives and Records Management Department (hereinafter the Archives) to complete the study of e-mail in this unit. As required by the procedures of IP3, information regarding the HRO, its records and its operations were compiled through interviews with SFU’s archivists and the HRO’s director.

1 Information regarding the Office of the University Secretary (USEC) at the University of Victoria (UVic) is available at http://www.interpares.org/ip3/display_file.cfm?doc=ip3_canada_cs10-3_final_report.pdf. Information regarding the University of British Columbia Archives: (UBC) Policies, Procedures and Tools for E-mail Management and Preservation in an Academic Unit, is available at http://www.interpares.org/ip3/display_file.cfm?doc=ip3_canada_cs10-1_final_report.pdf.
In May 2009, the GRAs completed the contextual analysis of the HRO test-bed.\(^2\) Several months later, the GRAs provided answers to the Policy, Records and Recordkeeping Systems Questions, as per IP3 case study procedures.\(^3\)

In September 2009, the GRAs met with SFU’s University Archivists, I. Forsyth and P. Hebbard, to discuss the developments and objectives of this case study. At this meeting, it was decided that the best way to continue with this case study would be to devise an implementation plan for the classification and filing of the e-mail records at the HRO. This plan was to outline all the necessary steps to be taken to successfully conduct the research and implement action items for this test-bed. The plan would also function as a guide for the HRO, clarifying the procedures and the order in which they may occur, showing the time commitments required of each party, and establishing tentative deadlines for each task. Moreover, the plan aimed to facilitate accomplishing the first two objectives of the case study (i.e., the effective management of e-mail records by their creator; and the appraisal, identification and selection of e-mail records of enduring value), which would allow for the researchers to address the third and fourth objectives (i.e., the long-term preservation of authentic and reliable e-mail records selected for permanent preservation; and the provision of access to e-mail records selected for permanent retention).

After several months of inactivity, at the May 2010 TEAM Canada Plenary Workshop, it was discussed that I. Forsyth and P. Hebbard would design and implement the new file plan for the HRO’s e-mail. To develop this new plan, the Archives conducted an inventory of the HRO’s records to ascertain its activities and the records resulting from the carrying out of those activities. After a certain period of use, the GRAs would discuss with the Director of Human Rights (hereinafter “the Director”) her use of the plan to determine what did or not work and any modifications that needed to be made.

By the November 2010 TEAM Canada Plenary Workshop, the Director had made it clear that her participation in this project was not a high priority. Moreover, she had gone on leave

\(^2\) Leah Pearse and Donald C. Force, “Case Study 10(2b) Contextual Analysis: Human Rights Office at Simon Fraser University,” InterPARES 3 Project, TEAM Canada (v1.6, October 2009).

from June to mid-November and was unavailable for that time period. As a result, the file classification was still a work in progress. The file classification plan would be completed and approved in early 2011. P. Hebbard subsequently worked with the Director to apply the new plan to her inbox. Unfortunately, following the implementation of this plan, the Director withdrew her participation from InterPARES in February 2011 citing two primary reasons:

1) the unnecessary need to perform extra steps to manage her e-mail; and
2) the work adds to already demanding tasks.

The remainder of this report aims to review the work accomplished under this test-bed and explain further why it was unable to accomplish its intended objectives.

C. Description of Context

**Provenancial**

The origins of the HRO can be traced to 1984 with the formation of the Women’s Committee of the Students’ Society. In 1986, this committee produced a report on sexual harassment and sexual assault at SFU, leading to a university committee that created the original Harassment Policy in 1988-1989 and the Employment Equity Policy in 1989, which were approved by the Board of Governors. The HRO was previously known as the Harassment Resolution Office and it was governed by this Harassment Policy. The policy was reviewed, revised and approved in 1997-1998 and later expanded to include discrimination and equity. The policy and office were renamed Human Rights to accurately reflect the scope of its functions and responsibilities. According to the Harassment Resolution Office Administrative Manual, created for the office in 1998, “The HRO has evolved from the initial part-time position of Harassment Policy Coordinator (held by a working faculty member) to its present state as an office staffed by a full-time Harassment Resolution Coordinator and a full-time Harassment Resolution Officer.”

This test-bed consists of a single employee, the Director of Human Rights and Equity. She is a lawyer “who has worked exclusively in post-secondary education for the past ten years, and exclusively in human rights since 1980” and has held the position since 1998. In the event

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7 Simon Fraser University, “Vice-President, Legal Affairs.” Available at [http://www.sfu.ca/avppolicy/](http://www.sfu.ca/avppolicy/).
that the Director is away from the office for an extended period of time, a temporary replacement is sometimes hired in her absence. Occasionally, the Director hires editors, business analysts and health professionals under the terms and conditions of an Independent Contractor Agreement, which includes a Privacy Protection Schedule. The Director works with the Human Rights Policy Board, complainants and respondents, and university officers responsible for units in which harassment and discrimination allegations take place. She also works with investigators on a very infrequent basis.

**Juridical-administrative**

Simon Fraser University is defined as a public body by British Columbia’s *University Act*, RSBC 1996, c 468. Furthermore, because the university is listed in an appended schedule to the *Freedom of Information and Protection of Privacy Act* (FOIPOP), all records generated by University employees are subject to that legislation, including all e-mails. Specific suggestions for addressing personal information and FOIPOP are provided in the “FOIPPA Considerations” section of the “Protocol for Investigation – Human Rights Policy (GP-18).” There are a number of provincial and federal laws relating to human rights, equity, harassment and discrimination that govern the activities of the HRO, such as the *British Columbia Human Rights Code* and the *Employment Equity Act of Canada*. Additionally, the work of the HRO is governed by a number of policies and procedures created by the University. The central policy is SFU’s Human Rights Policy (GP-18), which covers discrimination, harassment based on a prohibited ground of discrimination, sexual harassment and personal harassment.

The other most relevant policies and procedures include:

- SFU’s Employment Equity Policy (GP-19);
- SFU’s Disability Accommodation Policy (GP-40);
- SFU’s Access to Information and Protection of Privacy Policy (I-10.04);
- SFU’s Confidentiality Policy (I-10.10);

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• Harassment Resolution Office Administrative Manual (July 1998).  

**Procedural and Documentary**

The HRO, like all bodies within SFU, is subject to records and information management policies developed by the Archives and Records Management Department. The University Archives has developed a number of policies related to information management.  

According to the University’s Directory of University Records, there are five Records Retention Schedules and Disposal Authorities (RRSDAs) that apply to the HRO:

- Harassment Complaint Resolution Audio and Audio-Visual Records (1998-022);
- Harassment Consultation and Informal Resolution Case Files (1998-017);
- Harassment Formal Investigation Case Files (1998-019);
- Harassment Mediation Case Files (1998-018);

The SFU’s Archives and Records Management Department created an Administrative Manual for the HRO (last updated in 1998), which contained a file classification plan for the office’s records. However, the responsibilities of the office have expanded since 1998 and the file plan no longer accurately reflects all the office’s activities. Moreover, the recordkeeping rules and procedures used at the HRO are based on the Director’s own idiosyncratic practices. Any similarities between the Manual and the Director’s recordkeeping practices is probably attributable to the predominance of case files that naturally result in a relatively straightforward classification scheme. The Director arranges her paper-based subject and case files in chronological sequence by name of complainant or person, or subject, and places them in secure filing cabinets within the secured office.

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16 Available in SFU’s Archives and Records Management Department.
17 For more information, visit the Archives’ Web site at [http://www.sfu.ca/archives](http://www.sfu.ca/archives).
24 This case study revealed the need to update the classification section of this manual to better represent the HRO’s current functions, a task accomplished by the University Archivists in late 2009.
The digital versions of these records do not exhibit the same level of control because they are maintained in the e-mail client. The Director adheres to a two “bucket” approach for the organization of her e-mail messages: one bucket for all incoming messages (i.e., the Inbox) and one bucket for all outgoing messages (i.e., the Sent folder). All important messages pertaining to case files are printed and filed, thereby relegating e-mail to a type of back-up system. As of 2009, the Director has approximately 10,000 messages in her Inbox and Sent folders and accumulates between 12 to 50 e-mails each day. Purging of transitory e-mails occurs on a regular basis. The deleted folder is emptied when the Director logs off from her e-mail program, which typically occurs twice a day (once from the office and once from home).

**Technological**

The HRO uses a PC that is connected to a network drive at the University where digital records may be stored. The Director does not save documents to her desktop; her desktop only serves as a temporary space for moving documents between her e-mail and the server. She does use a University laptop when working at home. At the time of this study, she did not use any other technological devices to conduct her day-to-day business activities but has since acquired an iPhone (it is unclear if she uses this device to access and manage her office e-mail).

The Director creates documents primarily in Word (.doc) format, though occasionally creates an Excel (.xls) or Adobe (.pdf) document. These documents may be attached to any given e-mail.

In late 2008 and early 2009, SFU upgraded its e-mail system to Zimbra, an Open Source e-mail application. Using MS Outlook (front end) in conjunction with Zimbra (back end), the Director is satisfied that all the necessary components for sending, receiving, and storing messages are established to meet her needs.

**D. Narrative Answers to the Applicable Set of Questions for Researchers**

This case study focused on the Director of the Human Rights Office and her use of e-mail. The following narrative provides additional contextual information regarding how she manages this type of correspondence.


26 As per the case study procedures of IP3, the GRAs collected data about the policy-making and disseminating procedures at Simon Fraser University at the outset of this case study [Elaine Goh and Donald C. Force, “Case Study 10(2b) – Simon Fraser
The Director uses e-mail for the majority of her correspondence and estimates that 90% of all records filed are e-mail messages. The activity most frequently documented is the provision of information and expert advice to people, followed by routine correspondence, such as answering casual inquiries and arranging meetings and, most infrequently, consulting with and seeking feedback from the university community about proposed revisions to three specific SFU policies: Human Rights Policy (discrimination and harassment), Disability Accommodation Policy and Employment Equity Policy.

The intended users of the e-mail messages are not confined solely to the Director and employees (i.e., faculty, staff and administrators) or students at any of SFU’s three campuses (Burnaby, Surrey and Vancouver); rather, the Director corresponds with contacts at other universities, government employees, health care professionals, legal counsel, contractors (e.g., temporary hires including editors, business analysts and health professionals) and members of the public.

The Director’s practice is to print e-mail messages relating to consultation and complaint case files as well as substantive subject files. Routine e-mail correspondence is not printed. Once printed, the Director files e-mail messages according to her self-devised recordkeeping system; and treats the printouts as the original version, meaning, she refers to the printed versions rather than the digital versions of the records. The Director retains the digital record copy in the e-mail application’s inbox or sent folder (i.e., they remain on the SFU IT’s e-mail server). As stated in the contextual analysis: “Due to the sensitive nature of HRO cases, digital e-mails are seen to serve as a necessary back-up. The electronic versions are retained in case they are needed as part of a review or in the event of a subsequent legal proceeding.”\(^\text{27}\) The Director does not use a folder structure to manage her e-mails, relying on the Inbox and Sent folders to retain all the messages. She routinely deletes the majority of her e-mails because they document general inquiries that are transitory in nature and junk mail (estimated at 80%). As for attachments, the Director prints to file and keeps the original message with the attachment in her e-mail application.

\(^{27}\) Leah Pearse and Donald Force, “Case Study 10(2b) Contextual Analysis: Human Rights Office at Simon Fraser University,” InterPARES 3 Project, TEAM Canada (v1.6, October 2009): 9.
In the normal course of business, the Director does not question the authenticity of an e-mail message sent to her. She accepts its accuracy and reliability at face value. The only time she verifies the sender is when the e-mail message will be used as evidence and she needs to prove the identity of the sender as well as the time and date stamp. Moreover, the Director does not alter any of her e-mails. For most e-mail messages, the Director relies on metadata that are automatically generated by the e-mail client’s program, such as names of the sender or intended recipient, dates (e.g., received, sent, and modified), size of the file, if the message contains any attachments, and various other embedded information that is not readily visible. Metadata are never manually added to an e-mail message, nor is the subject line altered in replies or forwards. In some cases, messages are “flagged” or prioritized.

The HRO has a recordkeeping system in place for its paper records but not its e-mail records. This system includes a file plan, retention schedules, and policies and procedures for classifying and managing the hardcopy records. However, the Director has largely ignored these tools, organizing and retaining the records based on her own personal preferences. Any similarities between the approved file plan and the Director’s filing practices are coincidental and likely attributable to the predominance of case files in the office that naturally result in a relatively straightforward classification scheme. For example, the Director applies the plan to records documenting disability accommodation (subject and case files) and employment equity (subject files) in the same way as she does for the discrimination and harassment function of the office, but arranges the paper-based subject and case files in chronological sequence by name of complainant or person, or subject, and places them in secure filing cabinets within the secured office. The digital versions of these records do not exhibit the same level of control as they are simply maintained in the e-mail client. Despite the Manual’s call for the office to transfer files to the Archives under approved records retention schedule and disposal authorities, the Director prefers to retain her records under lock and key in storage space in the office.

28 Per the University’s Directory of University Records there are five Records Retention Schedules and Disposal Authorities (RRSDAs) (http://www.sfu.ca/archives2/dur/rrsdas.html), there are five schedules that apply to the HRO: Harassment Complaint Resolution Audio and Audio-Visual Records (1998-022); Harassment Consultation and Informal Resolution Case Files (1998-017); Harassment Formal Investigation Case Files (1998-019); Harassment Mediation Case Files (1998-018); and Harassment Resolution Office Subject Files (1998-016).

29 According to an e-mail from Director of the HRO, “To maintain security of information, cleaning staff are ‘keyed-out’ of the HRO. They come twice a year to scrub floor, but otherwise, they do not have access [to the office]. Security is the only entity on campus that has access to the HRO.” E-mail correspondence between B. Taylor and L. Pearse, 6 May 2009.
E. Narrative Answers to the Project’s Applicable Research Questions

**How and when should these archives or programs prepare themselves for digital preservation?**

At the time of this case study, SFU’s University Archives did not have the capabilities to preserve digital records. Yet, this case study indicates that archives, such as SFU, need to start preparing for digital preservation through the development of policies and procedures that help govern the management of digital records during their active and semi-active stages. These actions will ensure that recordkeeping principles and controls are in place in the event that the Archives does gain the ability to preserve digital records.

**What differentiates the preservation of digital records from that of any other digital entity for which the archives might be responsible?**

In the case of e-mail, users typically express more control over the records, that is, they see a stronger personal attachment to e-mail than other types of business documents. Ironically, e-mail may be less organized than most other digital or paper records within an office. E-mail will be more voluminous than most other types of business documents, especially if users do not take the initiative to cull transitory messages or delete messages when the records’ retention periods expire.

**What are the nature and the characteristics of the relationship that each of these archives or programs should establish with the creators of the records for which it is responsible?**

The Archives needs to have a positive working relationship with records creators, as well as executive support; the processes, outcomes, and responsibilities necessary for the long-term preservation of digital records must constantly be articulated and communicated to these stakeholders. Unfortunately, there is only a certain limit to which an archives can stress the importance of better management of digital records, especially in an academic environment where departments, offices, faculty and staff may have higher levels of autonomy than in other businesses. The organizational culture in an academic environment is diverse and complex and comprises a wide spectrum of professions and subcultures such as academic and non-academic positions.30 In such a culture, decision-making processes involve negotiation with different interest groups. As such, developing and implementing a coordinated records management

programme that requires record creators to subscribe to standardised procedures and protocols presents its own set of challenges. Even in the best of working relationships, if the creator does not foresee a problem or has the capability of remaining relatively independent of the archives, then digital preservation of those records will be haphazard at best.

What kind of policy, strategy and procedures should any such archives or program have in place to be able to control the digital records for which it will be or already is responsible from creation to preservation, and on what factors are these administrative devices dependent (e.g. a specific accountability framework and governance structure)?

Within an academic environment, policies may be issued from different levels of authority. In the context of the SFU case study, University-wide policies need to be sanctioned and approved by the Senate or the Board of Governors. University departments often create and disseminate their own policies that relate specifically to their sphere of functional responsibility. These policies do not carry the same weight as university-wide policies and they are generally restricted to the delivery of some service. For example, the Archives has developed procedures that departments need to follow for transferring records to semi-active storage in its record centre. In academic environments, decision-making can be a prolonged process of negotiation amongst different professional and interest groups. As such, developing accountability structures to delineate the roles and responsibilities of records creators and the Archives should be endorsed by the senior levels of authority within the university and the endorsement needs to be accompanied by the appropriate resources (e.g., money, training, staff, etc.) and some means of enforcement.

What knowledge and skills are required for those who must devise policies, procedures and action plans for the preservation of digital records in small and medium sized archival organizations or programs?

It is essential that individuals responsible for the preservation of digital records be familiar with the technology involved in the creation and management of the digital records. Archivists need to be aware of the different file types that records may be saved in, as well as the different computer programs and hardware that will allow access to the records. Archivists need to be cognizant of organizational culture issues within their organizations—square pegs of archival practices cannot be forced into round holes of organizational reality. Within the

academic environment, there are multiple subcultures operating within the same and or different organizational units, which may be based on different occupational and/or professional groups. For example, the non-academic staff comprises technical staff, clerical staff and senior administrative staff and each group has its own unique values and work processes. Although the records professional may understand the value of classification schemes, retention and disposition schedules, it must be acknowledged that not everyone in the organization will accept this body of knowledge or see its importance. To overcome this resistance, recordkeeping practices must, to a certain extent, be flexible. The difficulty is striking a balance between helpful but simplified guidelines and rigid procedures that accomplish benchmark objectives. Recordkeeping should be as unobtrusive as possible. It may also be beneficial if clearly articulated procedures are created to help employees make new transitions between old and new recordkeeping management practices. Moreover, archivists need to be sensitive that different professional groups and record creators may understand, internalise and interpret records management concepts differently from the records management and archival science disciplines. In some cases, archivists have to adopt multiple lines of communication strategies with different groups of stakeholders, including senior management and line supervisors, and pitch records management messages priorities differently to specific groups.

F. Bibliography of Relevant Material

The following bibliography is divided into two main categories: those documents created as part of this specific case study and a group of secondary literature on e-mail management and preservation. The latter section is further divided into seven sections: News Media, Case Studies, Records Management, Personal Information Management, Organizational Culture, Legal, and E-mail Standards & Guidelines.

I. InterPARES 3—Human Rights Office


_________. “Case Study 10(2b) – Simon Fraser University Human Rights Office (SFU-HRO): Policies, Procedures and Tools for E-mail Management and Preservation in an
Administrative Support Unit: Records Research Questions,” InterPARES 3 Project, TEAM Canada (v3.1, October 2009).


Pearse Leah, and Donald C. Force. “Case Study 10(2b) Contextual Analysis: Human Rights Office at Simon Fraser University.” InterPARES 3 Project, TEAM Canada (v1.6, October 2009).

II. E-mail Bibliography

**News Media**


Lukesh, Susan S. “E-mail and Potential Loss to Future Archives and Scholarship or the Dog That Didn't Bark.” *First Monday* 4, no. 9 (1999).


**Case Studies**


**Records Management**

Enneking, Nancy E. “Managing E-mail: Working Toward an Effective Solution.” *ARMA Records Management Quarterly* (July 1998).


### Personal Information Management


**Organizational Culture**


**Legal**


**E-mail Standards & Guidelines**


“E-mail Guidelines for Managers and Employees.” Collaborative Electronics Records Project (Rockefeller Archive Center, Smithsonian Institution Archives, 2006).


“Email Records Guidance.” Collaborative Electronics Records Project (Rockefeller Archive Center, Smithsonian Institution Archives, 2007).


G. Findings, Recommendations and Products

This case study sought to create a generic set of guidelines that can be used in other departments to implement the management of e-mail within a structured environment that will then facilitate their destruction, or, for those records with enduring value, their transfer to the archives for preservation. Unfortunately, these guidelines did not materialize due to the HRO Director’s withdrawal from the project in February 2011. The Director determined that she could not devote the appropriate amount of time to meet the needs and expectations of the case study and felt it was unnecessary that additional classification steps needed to be taken with regards to her e-mail management. The Director did not see a problem with the way in which she managed her e-mail. Despite the project not being completed in its entirety, a couple of products may be discussed; several lessons can also be learned from this experience that may benefit present and future e-mail case studies.

From the outset, the Archivists and GRAs attempted to be as transparent as possible with the Director regarding the case study’s expectations, time commitments and personal obligations. One of the early products that this case study created was an Implementation Plan.32 This document aimed to clarify to the Director all the steps we intended to take to accomplish this case study, the persons responsible for these tasks, an estimate of the time required for each task and the date by which each task was expected to be completed.

The involvement with this test-bed resulted in the Archives needing to review and update the HRO’s existing file classification plan. After an evaluation of the current file structure, a new plan was finalized in early 2011. In an attempt to facilitate the Director’s busy schedule and inability to devote large portions of time to reviewing and learning a new version of her classification structure, the Archives created three versions of this plan: a “long version,” a “short version” and a “classification cheat sheet.”33 Although the Director works primarily in paper records, a version of the plan was also applied to her e-mail. P. Hebbard created a separate classification structure in the Director’s Outlook account with the idea that new incoming and sent messages would be appropriately classified and, time permitting, older messages would be “re-classified.” Once again, the Archives created documents to facilitate this transition and assist

32 Donald Force and Elaine Goh, “Case Study 10(2b) - Simon Fraser University Human Rights Office: (SFU-HRO) Policies, Procedures and Tools for E-mail Management and Preservation in an Administrative Support Unit: Implementation Plan on Development of File Classification Plan and Filing of E-mail Records at SFU-HRO,” InterPARES 3 Project, TEAM Canada (v2.2, September 2009).
33 Authors’ note: These plans are not publically available and are the products of Simon Fraser University Archives.
the use of the new structure; these included an “E-mail Organization/Management Primer” and a set of instructions for classifying e-mails.\textsuperscript{34}

Despite the aforementioned documentation, the test-bed did not succeed. Organizational culture may be identified as one of the major reasons for its lack of success. The Director did not see a direct benefit to the Office or her daily functions in participating in this study, especially since she did not experience e-mail overload and has had little if any trouble searching and retrieving messages. More importantly, the Director was not clear on what was required of her (despite the Implementation Plan); she later indicated that the study was more involved than she had anticipated.

The University Archivists explained on several occasions to the Director the benefits of participating in the research, which included those directly related to her office, such as improved risk management, and to the University, such as finding a solution for better e-mail management, which the Director acknowledged. Yet, these contributions could not overcome the major challenge facing the case study: the HRO is an office of a single employee who did not see a problem with her recordkeeping practices. The Director works very independently and, due to the nature of the office’s work, is extremely protective of her files. As a result, there is no pressure or incentive to share the records she creates with other units, and she does not currently experience any difficulties retrieving or classifying records. Thus, the Director saw no need to change her recordkeeping practices because she was not overwhelmed with the amount of e-mail she must manage on a day-to-day basis and viewed the classification of her e-mail as an unnecessary administrative burden.

In retrospect, the HRO did not serve as the ideal candidate for this type of case study. Although we believe the work would have provided a valuable learning experience for understanding how individuals adapt to new e-mail classification structures and the University would have benefited by receiving e-mail management guidelines or policy templates, this case study proved that in situations where the person primarily responsible for an office’s records management does not perceive there to be a problem, convincing that person to change his/her records management practices may be an insurmountable hurdle without executive support. As

\textsuperscript{34} Ibid.
learned from a previous SFU case study’s failure (i.e., SFU’s Facilities Development\textsuperscript{35}), there needs to be a strong commitment on the part of the parties responsible for records management for change to occur. Moreover, had the HRO continued with the research, it would have been doubtful that the recommendations and suggestions proposed by IP3 would have been effective because “a fundamental shift in the idiosyncratic records creation, use, management and preservation practices” would have been required on the part of the Director.\textsuperscript{36} To increase the likelihood of success, future case studies must select partners that already experience or perceive imminent problems with records management.

\footnotesize{\textsuperscript{35} See Leah Pearse and Donald Force, “Case Study 10(2a) – Simon Fraser University Facilities Development: Final Report,” InterPARES 3 Project, TEAM Canada (v2.1, August 2009). Available at http://www.interpares.org/ip3/display_file.cfm?doc=ip3_canada_cs10-2a_final_report.pdf.\\textsuperscript{36} Ibid., p. 12.}