

Records Management

Effective Date: February 07, 2006
Last Revised: August 21, 2021
CAO Signature: 

PART 1 – INTRODUCTORY PROVISIONS

1. Policy Statement

- (1) The City's Records Management Program is authorized by Council through the Records Management Bylaw No. 2878, 2021.
- (2) Records management ("RM") is a priority for the City, ensuring that critical records are preserved and protected for as long as required.
- (3) All records created by the City are the property of the City and subject to municipal regulatory and legislative provisions, policies, best practices and the Freedom of Information and Protection of Privacy Act ("FIPPA").
- (4) The City will appropriately provide access to, manage, preserve, and dispose of, its records in compliance with RM legislative and regulatory requirements, including FIPPA and the Community Charter, and relevant municipal policies and standards.
- (5) The City's RM Program is established in alignment with the Local Government Management Association (LGMA) Records Management Manual, as amended.

2. Purpose

- (1) The purpose of this administrative policy, along with the individual protocol documents noted throughout this document, is to establish the framework and accountabilities necessary for the management and control of the City's records so that they are:
 - (a) organized, secure, retrievable, legible, and defensible;

- (b) maintained under appropriate conditions;
- (c) retained according to statutory requirements; and
- (d) managed throughout their lifecycle.

3. Scope

- (1) This policy applies to all City employees, Council members, volunteers, and contracted service providers while performing their duties under contract to the City, **collectively referred to as 'Staff' throughout this Policy.**
- (2) This policy applies to all recorded information under the custody and control of the City, regardless of its digital or physical format, including:
 - (a) Electronic messages relayed via information communications technologies (including email, instant messaging, voicemail and any other messages created using mobile devices);
 - (b) Data maintained on electronic systems (e.g. databases, applications, platforms, servers or other computer applications);
 - (c) Metadata which is system information used to manage data and records (e.g. code/logs);
 - (d) Paper records (correspondence, reports, forms, statistics, publications, etc.);
 - (e) Calendars, appointment books, diaries and notebooks containing staff's notes relating to work activities;
 - (f) Maps, plans, blueprints, and diagrams, including information stored in geographic information systems (non-textual records);
 - (g) Microfilm and microfiche records;
 - (h) Photographic records, audio, video recordings and special media (includes analog negatives and prints, digital and digitized, physical or digital); and
 - (i) Any other documentation that records organizational work and/or activities.

4. Exclusions

- (1) This policy does not apply to records:
 - (a) created or received by a member of Council, other than those records created, received or used in their capacity as a member of Council;
 - (b) of employees that are personal in nature and do not relate to the operations of the City and are not required for such operations;
 - (c) of community associations or other organizations or entities which have an operating agreement with the City, other than those records created, received or used in relation to their contract with the City;
 - (d) of City volunteers that are personal in nature (including convenience or personal copies of City records such as policies, committee agendas, and committee minutes) and/or do not relate to the operations of the City;
 - (e) that are not within the custody or control of the City.

5. Definitions

- (1) In this policy:
 - (a) **Archives Coordinator** means the Legislative Services Clerk II;
 - (b) **Confidential record** means a record with strict confidentiality requirements including but not limited to: economic or financial information; third party business information, where its disclosure could harm the third party; legal advice or correspondence; law enforcement information; the substance of deliberations of a Closed Council meeting; and other proprietary information of the City;
 - (c) **Control** means the authority to manage a record throughout its lifecycle, including regulating its use, security, retention and disposition;
 - (d) **Custody** means having physical possession of an official record and effect over its care and protection;
 - (e) **FIPPA** means the Freedom of Information & Protection of Privacy Act;

- (f) **LGMA** means the Local Government Management Association;
- (g) **Personal information** means recorded information about an identifiable individual, other than business contact information, including home address, sex, age, education, medical history, ethnicity, criminal or employment history, family status, personal contact information such as phone number or email address, or any identifying number, symbol, or image (e.g. photograph);
- (h) **Record** includes books, documents, maps, drawings, photographs, letters, vouchers, reports, papers and any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means, but does not include a computer program or any other mechanism that produces records;
- (i) **Records Coordinator** means a department team member, appointed by their manager, to provide RM support to their team to ensure the proper creation, maintenance, protection, storage, and retention of City records in accordance with this policy;
- (j) **Records Management (“RM”) Manual** means the collection of bylaws, policies and procedural documents, created and compiled by the Records Officer, that provides for the management of the records of the City, as authorized through the Records Management Bylaw No. 2878, 2021;
- (k) **Records Manager** means the Deputy Corporate Officer;
- (l) **Records Officer** means the Corporate Officer of the City who is designated and authorized through the Records Management Bylaw No. 2878, 2021 to act on behalf of the City to manage and maintain the City’s Records Management Program;
- (m) **Records Classification & Retention Schedule** or **RCRS** means a formal schedule, as amended from time to time, that establishes the classification system and retention periods for the records of the City and provides for their disposition.
- (n) **Reference Sheet** means a process document included within the Records Management & Privacy Program Manual, managed by and available from the Records Officer or Manager;

- (o) **Staff** includes City employees, Council members, volunteers and contracted service providers;
- (p) **Transitory records** mean records of temporary usefulness that are required for a limited period of time in order to complete a routine action or prepare a final record.

6. Roles and Responsibilities

- (1) The **Records Officer** is responsible for:
 - (a) the administration of this policy;
 - (b) the development, maintenance, and oversight of the City's RM Program, including the Records Management Manual, the Records Classification & Retention Schedule, all reference documents mentioned throughout this policy, and other policies and procedures established as part of the RM Program;
 - (c) the development and implementation of RM training for Staff; and
 - (d) monitoring program compliance.
- (2) The **Records Manager** is responsible for RM tasks and administration as delegated by the Records Officer.
- (3) The **Archives Coordinator** is responsible for:
 - (a) the oversight and maintenance of the Archives Room;
 - (b) the maintenance of records related to the Archives Room including the inventory of boxes in the Archives Room, file transfer records, and destruction records;
 - (c) the coordination of the annual archiving and records destruction process; and
 - (d) managing and fulfilling requests for access to records in the Archives Room.
- (4) **CLT Members** are responsible for:
 - (a) approving the transfer of semi-active records to the Archives Room as part of the annual archiving process;

- (b) approving the destruction or permanent retention of departmental records at the end of their lifecycle; and
 - (c) encouraging staff participation in annual RM training.
- (5) **Department Managers** are responsible for:
- (a) ensuring their direct reports adhere to the City's RM policies and procedures;
 - (b) approving time required for staff to attend annual training related to RM; and
 - (c) appointing a Records Coordinator, if desired, to support their team with RM related tasks.
- (6) **Records Coordinators** are responsible for tasks related to departmental records management as assigned by their managers.
- (7) All **employees, Council members, volunteers and third-party service providers** are responsible for managing and securing the records they create, collect, amend and receive in the context of their functional responsibilities, and in compliance with this policy.
- (8) **Service Providers** are responsible for understanding their responsibilities to manage and protect City records as described within the '**Records Management & Privacy Protection Schedule**' which is to be appended to all service agreements.

PART 2 – RECORDS MANAGEMENT

7. Access to, Storage, and Security of City Records

- (1) All Staff will observe the following RM standards:
- (a) All records in the custody or control of staff, which are created or received in the context of the staff member's functional responsibilities, are the property of the City;
 - (b) City records will be organized, maintained, and stored in a manner that makes them accessible to authorized users to fulfill the duties of their position/role;

- (c) Digital, non-transitory City records will be stored in one of the City's approved document management systems; see '**Approved Document Management Systems**' Reference Sheet for an approved list;
 - (d) City records containing sensitive, personal and/or confidential information will be securely stored, either in secure filing cabinets or in an approved document management system, with the necessary security measures in place to limit access to authorized users who require the information to fulfill the duties of their position/role;
 - (e) City records will be managed and preserved to ensure they remain authentic, reliable, trustworthy, secure, complete and accessible throughout their lifecycle regardless of location, media, or format. This includes during the conversion or migration from one media, format, or system to another;
 - (f) City records will be protected from unauthorized disclosure, modification, removal or destruction at all times;
 - (g) City records created in the conduct of business must be of a professional and objective nature, keeping in mind that any City record may be subject to release under FIPPA.
- (2) All City employees, Council members, and volunteers will read and sign the **Records Management & Privacy Protection Employment Agreement** to ensure they understand their role and responsibilities in the protection and maintenance of City records.

8. Records Management When Working Remotely

- (1) Staff will ensure the protection and security of all records when working remotely.
- (2) Staff will undertake necessary measures to safeguard records from risks such as unauthorized collection, use, disclosure, access and destruction while offsite or in transit.
- (3) Staff will observe the standards of care outlined in the '**Records Management & Privacy Protection When Working Remotely**' Reference Sheet to safeguard records while travelling or working remotely.

9. Records Classification & Retention Schedule

- (1) The Records Officer is responsible for creating, maintaining and modifying as required the City's **Records Classification & Retention Schedule** ("RCRS"), which forms part of the Records Management Manual.
- (2) The RCRS:
 - (a) will include the City's file plan and prescribed timetables that govern the lifecycle of all records, from creation to destruction; and
 - (b) will be based on the LGMA Records File Plan and Retention Schedule ("LGMA File Plan"); any variations from the LGMA File Plan must be approved by the Records Officer who will consult with the necessary subject matter experts and/or legal counsel on retention requirements before approving any changes.
- (3) Staff will create, retain, manage and dispose of City records according to the City's RCRS.
- (4) Staff will not destroy City records except as approved through this policy or its accompanying protocol documents.
- (5) Staff will follow the procedures established in the *'Requesting an Amendment to the Records Classification & Retention Schedule'* Reference Sheet when requiring an update to any aspect of the City's RCRS, including the file plan, descriptions of records, or the active, semi-active or final disposition retention periods.
- (6) Staff leaving or relinquishing their positions with the City will ensure all City records within their custody or control are left to their successor.
- (7) Records that belong in the City's recordkeeping system but are not yet covered by the RCRS will be retained and arranged in a manner that aligns with and meets business requirements until an appropriate classification and retention schedule is developed and applied.

10. Email

- (1) Electronic mail ("email") created or received during the course of carrying out business activities and responsibilities is considered a City record and

is the property of the City.

- (2) Staff will manage email in accordance with the policies and procedures established for City records through the Records Management Program.
- (3) Staff will maintain their email accounts and regularly dispose of transitory records, as per section 13 of this policy.

11. Departmental Coordination of Records Management

- (1) Department managers will work with their teams to ensure efficient and effective processes for the proper management of departmental records.
- (2) Department managers may appoint a 'Records Coordinator' within their teams to help coordinate the proper creation and retention of departmental records, including but not limited to:
 - (a) saving City records to an approved document management system;
 - (b) ensuring records are added to key departmental files;
 - (c) ensuring the accuracy and completeness of departmental files; and
 - (d) working with the Records Department on the annual review of archival records and consideration of final disposition of records that have come to the end of their lifecycle.

12. Digitization of Records

- (1) The City supports the digitization of physical records to:
 - (a) replace original records with authentic, defensible digital copies;
 - (b) provide digital access to useful and/or important documents;
 - (c) reduce costs and space issues associated with the storage of physical records; and
 - (d) preserve important business and historical information;
- (2) Staff will create, maintain and store digital records in a manner that:
 - (a) protects the authenticity and integrity of the digital records;
 - (a) ensures that the digitized records can be managed, retrieved and preserved over the long term; and

- (b) enables timely, defensible destruction.
- (3) Whenever possible, Staff will implement digital processes for the creation, maintenance and storage of City records, and will limit the creation and storage of physical records.
- (4) Digitization can occur within the follow categories:
 - (a) digitization as part of a business process: routinely digitizing source records as they are created or received during a business process;
 - (b) digitization projects: digitizing a specific set of existing physical records to preserve the information, enable digital access, and protect source records from damage (especially if destined for City Archives);
 - (c) ad-hoc digitization of individual records: e.g. a signed travel authorization form or another document that needs to be transmitted or filed digitally.
- (5) When engaging in a digitization project where a set of physical records will be digitized and stored electronically, Staff will complete a ***Digitization Project Plan*** (template available from the Records Officer) to ensure the proper planning, preparing, digitizing, quality assurance mechanisms, storage of the new digitized records, and proper disposition of source (i.e. originating) records. Staff will seek proper sign off on the Plan before executing the final disposition of the source records.

13. Transitory Records

- (1) Transitory records are records of temporary usefulness that are required for a limited period of time in order to complete a routine action or prepare a final record.
- (2) Staff may immediately dispose of transitory records as soon as their business use ends. Managing transitory records allows for ease of identification and retention of key records while promoting cost effectiveness and informed decision making.
- (3) Transitory records do not include:
 - (a) Records that prove or track the delivery of a municipal service;

- (b) records that document historical, financial, legal, decision-making or a mandated project;
 - (c) drafts or revisions with information recording associated approvals or change of scope for an initiative;
 - (d) a final report with recommendations;
 - (e) formal internal/external communications;
 - (f) original copies of policies and directives;
 - (g) formal instructions, advice and verifications;
 - (h) documentation of a policy matter or how a legal case was managed;
 - (i) documentation of initiation, authorization, or completion of business transactions; or
 - (j) records subject to a FIPPA request or legal discovery.
- (4) Staff will follow the procedures established in the '**Managing Transitory Records**' and '**Tips for Email Clean Up**' Reference Sheets.

14. **Version Control and Naming Conventions (Electronic Records)**

- (1) Staff will utilize version control and naming conventions to ensure records are easily identifiable and retrievable, and that the correct version of an electronic record is being used.
- (2) Staff will follow the procedures established in the '**Electronic Record Naming Conventions and Version Control**' Reference Sheet when creating and saving electronic records.

15. **Vital Records**

- (3) Vital records are defined as records in any form that:
 - (a) contain information essential to the operations and/or survival of the organization;
 - (b) are integral to recreating its legal and financial position; and/or
 - (c) are necessary to preserving its claims and rights and those of its stakeholders.

- (4) The Records Officer will maintain a list of Vital Records and establish protective measures to safeguard these records.
- (5) Staff will abide by the protocol established within the 'Vital Records Program' Reference Sheet.

16. External Access to/Disclosure of Records

- (6) Staff will follow the procedures established in the **Information Access & Privacy Protection Policy A043** and provisions established within FIPPA when considering the external disclosure of City records.

17. Litigation and Document Discovery Requirements

- (1) The Records Officer will work with Staff to fully and cooperatively respond to all formal litigation and document discovery or audit requests, including cooperation with the Municipal Insurance Association of BC ("MIABC") on liability claims.
- (2) Staff will suspend final records disposition/destruction activities for all records responsive to document discovery or audit requests and other legally mandated processes (e.g. litigation, commissions of inquiry, FOI requests, MIABC claims, etc.), for the duration of the legal process. The records may proceed through their approved lifecycle in accordance with the City's RCRS once the legal process is completed.

18. Semi-Active and Permanent Offsite Storage

- (1) Definitions for this section:
 - (a) "Active" records are those records that are needed by staff on a regular basis for work and reference and need to be located in convenient locations for easy access;
 - (b) "Semi active" or "inactive" records are those records which are no longer needed by staff to perform their daily job functions, but may be needed for regulatory, audit or other requirements, and are therefore stored for a certain period of time before they are destroyed; and

- (c) "Permanent" records are those records which have come to the end of their lifecycle and have been permanently archived for regulatory, historical, or other reasons.
- (2) City records that are in their semi-active or permanent phase as per the City's RCRS may be stored offsite in the City's Archives Room.
- (3) The Archives Coordinator will coordinate the annual transfer of City records to the Archives Room.
- (4) Staff will follow the protocols established in the '**File Transfer to Archives**' Reference Sheet when preparing records for transfer to the Archives Room.
- (5) Should Staff require access to records in the Archives Room, they will reach out to the Archives Coordinator who will arrange for access to the Room or will transport the respective record(s) to City Hall depending on the situation and needs of staff.

19. Records Destruction and Disposal

- (1) City records are eligible for final disposition (i.e. destruction or permanent archive) when their scheduled active and semi-active retention periods have expired, as established by the City's RCRS.
- (2) The Archives Coordinator will coordinate the annual review of all records in the Archives Room that have come to the end of their semi-active state, to determine final disposition.
- (3) Staff will follow the procedures established in the '**Final Disposition of City Records**' Reference Sheet when preparing for and executing the final disposition of City records.
- (4) The approved physical destruction and disposal of City records will be executed by a recognized, reputable service provider (e.g. Shred-It).
- (5) The Records Department will:
 - (a) ensure the security, protection and confidentiality of records during the transfer of records to the service provider for authorized disposal;

- (b) obtain an official “Certificate of Destruction” from the service provider;
- (c) permanently retain the Certificate of Destruction and a detailed listing of the records which were destroyed.

20. Archival Records

- (1) Archival records are those deemed to have enduring value and are to be preserved per unique and specified historical requirements. Records that meet this criteria are those which document the activities, decisions and responsibilities of the City and contribute to an understanding of the history and culture of the organization (e.g. historical, financial, fiduciary, legal, evidentiary, cultural value, etc.). Examples include the historical records from the early 1900s discovered in the vault at the Heritage Hall in 2019.
- (2) The Records Officer will work with the Pitt Meadows Heritage and Museum Society to preserve archival records that have enduring, historical value.

21. Compliance and Auditing

- (1) The Records Officer may audit the use of City records or systems by Staff to ensure the City is in compliance with this policy, the City’s RCRS, and other RM policies and protocols.

PART 3 – RELATED POLICIES

22. Other related policies/documents include:

- (1) Records Management Bylaw No, 2878, 2021
- (2) Freedom of Information & Protection of Privacy Bylaw 2877, 2021
- (3) Policy A043 – Information Access and Privacy Protection
- (4) Records Management & Privacy Protection Schedule for Service Provider Agreements
- (5) Records Management & Privacy Protection Employment Agreement
- (6) Records Classification & Retention Schedule (RCRS)