



Records and Information Management
Policy 1-16 / Resolution #R347-21 .6
Effective December 20, 2021

CASTLEGAR

Records and Information Management

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AMENDED BY:

Policy Statement:

The purpose of this policy is to:

1. Ensure that all City of Castlegar records are created, used, disposed of and preserved in an efficient, systematic, standardized and cost-effective manner, compliant with relevant legislation;
2. Ensure that access to records and information is provided in compliance with the *Freedom of Information and Protection of Privacy Act* (FOIPPA);
3. Ensure prompt and accurate retrieval of records for better decision making;
4. Define roles and responsibilities for records management; and
5. Promote an open, accessible, and accountable government.

Authority:

This policy is established in accordance with the City of Castlegar Records and Information Management Program Bylaw which provides for the systematic control of the creation, use, maintenance, storage, security, retrieval and disposition of records by the City in the conduct of its operations.

1. Definitions:

"Access" means disclosing information contained within a record either as a result of a request under FOIPPA or a routine request for information.

"Authenticity" means, as it pertains to a record, that the record can be proven to:

- i. be what it purports to be;
- ii. has been created or sent by the person purported to have sent it; and
- iii. has been created or sent at the time purported.

"City" means the City of Castlegar.

"Classification" means the process of identifying records or information in accordance with a predetermined filing system. This includes determining the function and/or subject of a record and selecting the appropriate classification for filing.

"Control" means the power or authority to manage a record throughout its life cycle, including restricting, regulating and administering its use or disclosure.

"Custody" means having physical possession of a record, even though the public body does not necessarily have responsibility for the record. Physical possession normally includes responsibility for access, managing, maintaining, preserving, disposing, and providing security.

"Disposition" means disposal of records, through either destruction or permanent preservation, according to the prescribed retention schedule in the City's Records Manual and Retention and Disposition Schedule.

"Electronic Record" means records consisting of information that is entered, created, manipulated and/or stored on digital media/storage devices. This includes:

- records that are born digital.
- digitized records (i.e., records that have been converted from a non-digital format).
- unstructured data (i.e., documents and electronic messages).
- structured data maintained within electronic systems.

"Employee" means a person employed by the City, including volunteers and service providers.

"Integrity" means, as it pertains to a record, that the record is complete and unaltered.

"Office of Primary Responsibility" means the office or department that has primary responsibility for a category of records.

"Permanent Record" means a record which must be retained by the City because of its long lasting, essential value to the City.

"Record" means information created, received and maintained by the City. Includes, but is not limited to, emails, documents, books, maps, drawings, diagrams, sound recordings, videos, images, photographs, letters, papers, vouchers 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.

"Records Management" means the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records.

"Retention" means the length of time a record is retained, as governed by the retention schedule in the City's Records Manual and Retention and Disposition Schedule.

"Transitory Record" means a record:

- of temporary usefulness that is not an integral part of an administrative or operational records series;
- that is not regularly filed with a standard classification system;
- that is only required for a limited period of time for the completion of an action or the preparation of an ongoing record; or
- that is not required to meet statutory obligations or to sustain administrative or operational functions.

"Vital Record" means a record that is essential to the operation of the City and has been identified for protection from destruction in the event of a disaster.

2. Roles and Responsibilities

All employees of the City have responsibilities for the management of records.

It is the *responsibility of directors, managers and supervisors to:*

1. Lead by example and maintain good record keeping and records management practices.

2. Provide support in the development, implementation, maintenance and monitoring of a compliant records management program and system.
3. Ensure that records are created and managed in their department or business unit in compliance with records management policies and procedures, and any relevant legislation or regulations.
4. Provide resources for employee training.
5. Provide resources for technology, space, supplies and services necessary to maintain the records management program.
6. Authorize the final dispositions of records created by their department in conjunction with the Corporate Officer (or their designate) and the Chief Administrative Officer.
7. Ensure that contracts with service providers include records management clauses in accordance with this records management policy.

It is the responsibility of the *Corporate Officer or their designate* to:

1. Develop records management policies and procedures and provide guidelines to all employees to assist in the management of records.
2. Monitor compliance with records management policies and procedures and make recommendations for improvement or modification of practice.
3. Ensure legislative compliance with FOIPPA and respond to requests for information made under the *Act*.
4. Develop and deliver a records management training program.

It is the responsibility of *all employees* of the City to:

1. Manage their records according to the City's Records Manual and Retention and Disposition Schedule, this policy, and other relevant policies, procedures and guidelines.
2. Understand that records are a corporate asset and are essential to efficient business processes, decision-making and accountability. Therefore, all employees must create records of decisions and actions made in the course of official City business as evidence of those activities.
3. Ensure that they do not destroy official records without the correct authorization.
4. Ensure that records are saved into the City's recordkeeping systems.
5. Agree to the terms of and sign a Records Confidentiality Agreement.

3. Classification of Records

All records that are created or received by the City will be classified and given a unique file number according to the City's Records Manual, or other approved filing convention, to ensure efficient and systematic control of records.

All official records, including outgoing communications such as letters and emails, should contain reference to the file number whenever possible. If a classification does not exist, the Corporate Officer or their designate must be contacted to assist with additions to the City's Records Manual. Classifications should not be added to the manual without approval by the Corporate Officer or their designate.

4. Retention and Disposition of Records

All records will have a retention period that is prescribed in the City's Retention and Disposition Schedule. The retention period will determine the length of time that records are required to be maintained, taking into account its legal, regulatory, fiscal, operational and historical requirements.

Transitory records can be routinely disposed of by all employees in the course of their usual business as soon as the intended use of the transitory record has ended.

The Corporate Officer or their designate is authorized to assign specific time frames for retention to records, giving due regard to generally accepted records management practices and procedures, including legislative, regulatory and statutory obligations. Any changes to a retention period must be authorized by the Corporate Officer or their designate.

The authority to order the disposal of official records shall be limited to the Chief Administrative Officer and the Corporate Officer. No official records shall be destroyed or disposed of without written authorization.

All disposals of records must be documented on a Records Disposal Authorization Form. Prior to disposal, the officer authorizing the disposal of the records shall:

1. Ensure that the specified retention period has been complied with in accordance with the City's Retention and Disposition Schedule;
2. Verify that the records have been stored on an alternate medium if so required;
3. Refer to the Office of Primary Responsibility's manager for sign off that they are satisfied to the best of their knowledge that there are no extenuating circumstances which might require that the records be retained beyond their scheduled life;
4. Refer to the Corporate Officer for sign off to ensure that there are no Freedom of Information requests or legal holds pertaining to the records;
5. Refer to the Corporate Officer and the Chief Administrative Officer for sign off that they are satisfied to the best of their knowledge that there are no extenuating circumstances which might require that the records be retained beyond their scheduled life; and
6. Ensure that all records of a confidential or sensitive nature are disposed of accordingly.

5. Storage and Custody

All records will be kept in storage areas that are appropriate for the type of medium. Active paper records will be kept onsite for convenient access. Semi-active records that are no longer needed for routine access but are still required to be retained in accordance with their retention schedule in the City's Retention and Disposition Schedule can be transferred to alternative storage.

The official records of the City are the property of the City. When an employee is no longer an employee of the City, they must ensure that all records are left in the custody and under the control of the City.

6. Access and Security

Records must be protected at all times against unauthorized access and tampering. Records must be made available to all authorized employees that require access to them for business purposes.

Employees shall not remove records that are not available in the public domain from the premises

of the City unless it is required for official City business activities.

All records that can be made routinely available to the public will be provided where possible. The City will also provide access to information contained within a record according to the *Freedom of Information and Protection of Privacy Act*. Information and records that are not available in the public domain will only be disclosed as part of a Freedom of Information request or with the explicit permission of the Corporate Officer.

A vital records plan will be developed to protect essential records and ensure the continuation of key functions and activities in the event of an emergency or disaster.

7. Training

All employees will be provided with training as necessary in all aspects of records management.

8. Relevant Legislation

Community Charter [SBC 2003]

Freedom of Information and Protection of Privacy Act [RSBC 1996]

Local Government Act [RSBC 1996]

9. Related Documents

1. City of Castlegar Records Manual
2. City of Castlegar Retention and Disposition Schedule
3. City of Castlegar Records and Information Management Program Bylaw No. 1362, 2021
4. *Community Charter* [SBC 2003]
5. *Freedom of Information and Protection of Privacy Act* [RSBC 1996]
6. *Local Government Act* [RSBC 2015]