
Records and Information Management Procedure

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Purpose statement

The purpose of this procedure is to establish a comprehensive records and information management (RIM) program, as part of information governance, for the Town of Oakville (the town) in order to provide direction for the creation, identification, access, maintenance, retention, disposition, and safekeeping of information in all its forms under the control of the town and sustain the continuing conduct of business, comply with all applicable legislation, and ensure accountability.

The RIM program enables the town to:

- Manage the records and information lifecycle to adhere to legislative requirements;
- Make records and information readily available to support evidence-based decision-making and to respond to information access requests under the *Municipal Freedom of Information and Protection of Privacy Act*;
- Promote organizational efficiency and economy through effective recordkeeping practices, including optimal utilization of storage and technology;
- Protect legal, fiscal, and other interests of the town;
- Safeguard the reliability, integrity and authenticity of town records, ensuring they serve as evidence of organizational activity and decisions, thereby meeting legal, evidential, audit and accountability requirements;
- Identify and preserve permanently archival or historical records, enriching the corporate memory of the town and the collective memory of the community; and
- Establish and define accountability, roles, and responsibility for the appropriate level of involvement with the RIM program.

Scope

This procedure applies to:

- records and information in all formats within the town's custody and control, including active, inactive, permanent and archival record holdings.
- all town employees, consultants, contractors, part-time employees, and volunteers who create and consume records and information during the course of their duties in the town.
- the Mayor, as Head of the Council, and records and information generated relating to mayoral duties.
- all records and information generated by elected officials in the course of Council business and constituency records only if these records are integrated with other files held by the town with exceptions managed in accordance with the Elected Official Records Procedure.

Procedure

Records and Information Management Principles

The following principles and practices establish a framework for effectively managing information in the town.

1. Accountability and transparency

- The town creates or receives records that document its business activities, functions, policies, and decisions.
- The town manages its records and information through the RIM program, administered by the Clerk's Department.
- The town is committed to enabling employees to be accountable and transparent and make informed decisions.

2. Authenticity, integrity, and trustworthiness

- Records and information generated or managed by or for the town must be reliable and accurate and be a true representation of the actual activity.
- Town records must not be altered or tampered with and be legible.
- The town preserves the integrity of records, processes, and the systems in which the records are made, received, or stored. This includes establishing assurance that town records are what they purport to be, are uniquely identified and are free from tampering or corruption.

3. Availability and access

- The town maintains its information in a manner that ensures timely retrieval of reliable information when needed.
- Town records and information must be stored in an official repository, system or software to ensure that they can be accessed when needed. Except for those

containing personal or confidential information, they should be available and accessible to town employees.

- The town promotes a culture and business practice that ensures town information is shared and accessible as appropriate.
- The town adheres to privacy requirements under relevant legislation.

4. Compliance

- The RIM program complies with all applicable legislation, industry standards, authorities, town policies and practices.
- The RIM program is subject to internal audits and regulatory reports on performance indicators, including compliance with the program and training requirements designed to improve the RIM program continually.
- The town promotes information quality by means of its policies, procedures, training, and awareness initiatives.

5. Protection and security

- The town applies an appropriate level of protection to its information based on the level of sensitivity and impact on the town and provides the means for the town to meet its legal, regulatory, and contractual requirements.

6. Retention and disposition

- The town identifies and maintains records and information according to the Records Retention By-law (by-law), which is informed by its responsibilities under legal, regulatory, fiscal, operational, accountability and historical requirements.
- The town provides secure and appropriate disposition for records and information that are no longer required to be maintained in accordance with relevant legislation, by-laws, policy, and best practices.

7. Ownership

- The town owns records and information, including structured and unstructured data, that employees create, receive, and maintain during the course of their corporate duties. The ownership applies irrespective of the storage location of these records and information.

Records and Information Management Requirements

1. Records classification and retention schedule

- All town records are identified, retained, and disposed of according to the Records Retention By-law (by-law). This by-law is a key component of the RIM program and establishes the logical organization of records for their identification, control, retrieval, and disposition.

- The by-law is approved by the Council and maintained by the Clerk's Department.
- The by-law also acts as the electronic information architecture for the Town's Official Recordkeeping System.
- When records cannot be classified according to the by-law, the Clerk's department performs records analysis to obtain information on operational needs, legislative and audit requirements, potential archival value, and consultation with those responsible for the organizational functions that the records support to make any necessary recommended amendments to the by-law.

2. Creation and receipt

- Information is documented immediately or as close to the time when the event pertaining to it occurred to make sure all details are captured accurately and appropriately.
- Key requirements for town records:
 - complete and unaltered in all essential aspects; and
 - sufficient in content, context and structure to reconstruct the relevant town functions, activities, and/or transactions they support.

3. Official and transitory records

- To satisfy the evidential authenticity requirements, there is only one version of truth for town records, which is actively managed and trustworthy to satisfy the evidential authenticity requirements (Official Record).
- Records custodians are responsible for managing the official records assigned to them in accordance with the by-law.
- Transitory records can be disposed of when they are no longer needed, provided the record qualifies as a transitory record in accordance with the by-law.

4. Electronic records and information

- Where electronic town records are part of the town's usual and ordinary course of business (including digitized records), such records are maintained as the official town records in an electronic format, in lieu of paper, unless otherwise stipulated by the by-law.

4.1. Electronic metadata and audit trails

- Electronic town records must include or be linked to the essential metadata describing the content and context of the record (i.e., when a record is made, received, or stored in a repository), forming an integral part of the record.
 - Metadata allows employees to understand and interpret the record and supports the assessment of the trustworthiness of records, ensuring reliability, accuracy, and authenticity as evidence.
- The capture of audit data of the electronic repository and records, where applicable, is always ongoing, always protected from alteration and loss, collected into an audit

trail, and generated automatically by systems. The Clerk's department approves access to audit trail data.

5. Official recordkeeping repositories

Town records and information are organized, saved, maintained and accessible within the approved physical or electronic repository appropriate to their use, sensitivity, and lifecycle rules associated with their record series.

5.1. Physical repositories

- Physical repositories include an offsite storage site, filing cabinets, and storage rooms.
- Retention of inactive physical records, after completing their active phase within the department, is managed by the Clerk's department in a centralized offsite records repository. Records are transferred from departments to the offsite records centre in accordance with the internal standard operating procedure.

5.2. Electronic repositories

- Electronic repositories include an official town repository, system, or software sanctioned by the Clerk's and ITS departments that meet the following requirements:
 - Preserve complete and fixed impressions of records;
 - Register records and their associated metadata;
 - Protect records and information and their metadata from deletion and tampering;
 - Secure and restrict access to records and information;
 - Provide an audit trail and revision history for records and information and their metadata; and
 - Ensure records and information remain accessible over time.
- A repository accessible solely by individual staff and external storage (e.g., email inbox, USB drive, computer desktop/laptop, instant messages, Box, Google Drive) is not considered an appropriate or approved repository for town records.

6. Disposition

The disposition of town records is an integral part of the town's usual and ordinary course of business. Records are disposed of only when retention requirements have been satisfied in accordance with the by-law and after the appropriate reviews and processes have been completed and managed through the internal standard operating procedure.

Disposition of records can occur in one of two ways: through destruction and archival process.

6.1. Destruction

- No town records are destroyed until they are first classified according to the by-law and either the retention period has expired, or they are determined not to possess archival value except for backup data.
- The Records Destruction Memorandum and associated documents must be reviewed and signed by the department director or designate.
- The Town Clerk provides final approval for the disposition of all original town records prior to their destruction in accordance with the by-law, except for archival records.
- All town records are disposed of in a manner appropriate for the security and privacy requirements of the information contained within the records.
- All town records related to destruction are retained by the Clerk's department.
- A certificate of destruction will be issued by the contracted service provider or system for each act of destruction.

Transitory records do not require formal approval for destruction.

6.1.1. Suspension of destruction

- The Town Clerk has the authority to suspend scheduled record destructions when required to address legal requirements (e.g., MFIPPA), current or potential litigation, compliance, audit or other issues.
- The Town Clerk is also authorized to restart scheduled record destruction when all issues have been addressed and/or resolved.

6.2. Archives

- Archival records are appraised, preserved, and maintained following established policies and procedures.
- The Clerk's department appraises town records subject to archival selection according to the by-law before the department's review for destruction. This appraisal may include any town records obtaining archival value despite the retention and disposition assigned to them in the by-law.

7. Information security and access

- Records and information are available internally only to those requiring access.
- Records and information containing personal information or other sensitive information must be securely stored, preventing unauthorized access through technical or physical access controls.
- Town records and information will be assigned a sensitivity level based on an established internal process specifying the required protection level.
- The granting access and setting of security of the town's official recordkeeping repositories is established and managed through consultation with the Clerk's and ITS departments.

8. Records created/Maintained by departing employees

When employees depart from the town, the records and information for which they are responsible will be managed in accordance with the Guidelines for Records Created/Maintained by Departing Employees.

9. Decommissioned software programs/databases

When decommissioning or migration of business applications/systems will be undertaken, departments must consult with the Clerk's department to ensure the information contained within the system is retained in accordance with minimum retention requirements.

10. File naming conventions

All electronic records must be saved using the standard naming format outlined in the Electronic File Naming Conventions to improve the searchability and accessibility of the files.

References and related documents

Electronic File Naming Conventions (*internal document*)

Guidelines for Records Created/Maintained by Departing Employees (*internal document*)

Records Retention By-law

Municipal Freedom of Information and Protection of Privacy Act

Municipal Act

Definitions

Archives/Archival Record: a record or record series that has been appraised and is to be preserved for permanent retention because of its historical value.

Audit Data: the history of each record and the associated metadata.

Audit Trail: log of system activities that enable the reconstruction, reviewing and examination of the sequence of activities relating to an operation, a procedure or an event in a transaction.

Disposition: the final phase of a record's life cycle, meaning:

- a) destruction;
- b) permanent deletion;
- c) designation of record as permanent; or
- d) designation of record as archival.

Information: a collection of data and associated explanations, interpretations, and other textual material concerning a particular object, event, or process, which may take any form. Often used synonymously with data.

Information Architecture (IA): the structural design of the town's information environments. The IA applies information science to designing structures and systems for organizing, labelling, navigating, and searching information.

Information Governance (IG): the overarching and coordinating strategy for all town information holdings. IG establishes the authorities, support, processes, capabilities, structures, and infrastructure to enable information to be a useful asset and reduced liability to the town, based on specific business requirements and risk tolerance.

Lifecycle: the life span of a record from its creation or receipt throughout its active and inactive stage, to final disposition.

Metadata: information that defines and describes other information and it is used to aid the identification, description, location or use of information.

Official Record: the version of a town record deemed as the authoritative record, which is not a convenience or duplicate copy, but rather the final complete version, as determined by the proper authority, and is the single source of truth.

Record: has the meaning given to it by section 2 of the Municipal Freedom of Information and Protection Act, and includes any record of information however recorded and applies equally to paper and electronic records unless otherwise stated.

Records and Information: any unit of information however recorded, whether in printed form, on film, by electronic means, or otherwise, and includes correspondence, memoranda, plans, maps, drawings, graphic works, photographs, film, microfilm, sound recordings, videotapes, machine readable records, an e-mail and any other documentary material regardless of physical form or characteristics, made or received in the course of the conduct of town business.

Records and Information Management (RIM): the field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records and information, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records as defined in the ISO 15489-1:2016.

Records Retention By-law: a timetable that governs the lifecycle of a town record from its creation or receipt, to disposition, approved by Council.

Structured Data: data organized based on a pre-defined (applicable) set of rules as defined in the ISO/IEC 20546:2019.

Town Record: a record created or received in the course of town administration or delivery of town services.

Transitory Record: a record that has temporary usefulness and is only required for the completion of a routine action, or until superseded.

Unstructured Data: data which are characterized by not having any structure apart from that record or file level, including, but not limited to, electronic and physical records, videos, voice messages, text, instant messages, website, intranet, and social media content as defined in the ISO/IEC 20546:2019.

Responsibilities

All Town Employees

- Comply with the requirements of this procedure, applicable related procedures, and the Records Retention By-law, by ensuring that all records they create or receive that are used to support a town function or to conduct town business are maintained and preserved appropriately;
- Recognize that records and information maintained by the town have value;
- Create and maintain records whenever it is necessary to document, support or direct key decisions;
- Understand and apply records and information management, security, confidentiality, and privacy protection policies, standards, and practices;
- Identify town and transitory records and manage them in such a way that they provide concise, accurate, and complete evidence of decisions, transitions, and activities, regardless of communication methods; and
- Store town records and information in the approved physical or electronic repositories.

Leadership

- Maintains accountability for town records and information under their Commissions/departments;
- Endorses and actively supports this procedure and all related subsidiary policies and procedures;
- Ensures that their business processes comply with the records and information management obligations outlined in this procedure and applicable guidelines and standards;
- Ensures that employees are aware of and adhere to this procedure and relevant procedures, guidelines, and standards;
- Approves departmental records destruction requests;
- Notifies the Clerk's department to suspend the destruction of town records;
- Recommends retention periods relating to records in their business unit's custody or control to ensure the Records Retention by-law meets the business unit's operational requirements;
- Informs the Town Clerk of breaches of this procedure (e.g., unauthorized disposition of records)

Clerk's Department

Town Clerk:

- Maintains ultimate authority for the RIM practices and program;
- Ensures the appropriate retention and availability of town records and information in accordance with the *Municipal Act*;
- Signs off and approves the disposition of all original town records before destruction in accordance with the by-law and relevant procedures;
- Provides notice to appropriate parties to suspend disposition and retain Town Records beyond the approved retention timeline to address legal requirements, current or potential litigation, compliance, audit or other issues.

Clerk's Department (Town Clerk delegates the following tasks as required):

- Business owner of the Corporate Electronic Document and Records Management System;
- Provides leadership, direction and vision for the town's overall RIM program and information governance;
- Oversees the development, maintenance and operation of the RIM program and related policies and procedures;
- Provides advice, support and training to employees as they fulfill their RIM roles and responsibilities;
- Creates and maintains the Records Retention By-law with guidance from the Legal department;
- Establishes safeguards to protect archival records to preserve corporate memory;
- Obtains administrative access to all town records and information management systems to conduct periodic reviews of the systems and their contents, ensuring compliance with policies and By-laws and providing system-specific support, including activities such as migration and privacy impact assessments.

Information Technology Services Department

- Establishes, maintains and supports electronic RIM systems that include controls to ensure the security, accuracy, trustworthiness, reliability, quality and integrity of electronic town records and information the systems produce, including back-ups, logs, and recovery activities to the town's records and information;
- Ensures availability of information systems to enable the management of records during their life cycle in accordance with this procedure and all related policies and procedures; and
- Consults with the Clerk's Department on the implementation of software, primarily as it relates to the functions and capabilities for records and information management.