Document 10

Records Management Policy

Approved By: Rick O'Connor
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Policy Statement

Information, like time and money, is a City asset that must be managed in an accountable and transparent manner.

Purpose

The purpose of this policy is to define the basics of recordkeeping at the City of Ottawa and detail the responsibilities of all staff.

Application

This policy applies to all staff.

Policy Requirements

Why Keep Records?

We are *legally* obligated to do so:

- the Information Privacy Commissioner of Ontario has asserted that Ontario municipalities have a 'Duty to Document' obligation,

- there are many federal and provincial laws and regulations that require the creation and retention of records at the City, in addition; the *Municipal Act, 2001* mandates that the City "shall retain and preserve the records of the municipality and its local boards in a secure and accessible manner",
- the City Records Retention and Disposition By-Law requires that certain records be identified and managed, and
- good recordkeeping helps with ATIP and litigation requests.

Good governance demands it. Good recordkeeping:

- assures the protection of the public's right to access information,
- supports the City's obligations for accountability and transparency,
- provides evidence of decisions and decision-making,
- helps with *Municipal Freedom of Information and Protection of Privacy Act* requests and with Routine Disclosure requests, and
- preserves the archival legacy of the City.

Financial benefits come from good recordkeeping:

- avoids wasting time and money when searching for information,
- allows for the repurposing of existing information instead of starting a job from scratch, and
- controls the expense of records storage.

What is a Record?

The *Municipal Act, 2001* defines a "record" as "information however recorded or stored, whether in printed form, on film, by electronic means or otherwise, and includes documents, financial statements, minutes, accounts, correspondence, memoranda, plans, maps, drawings, photographs and films." In other words, records provide evidence on the conduct of City business and can be in any medium or format.

There are two types of records at the City: Official Business Records (OBRs) and Temporary Records.

Official Business Records

Official Business Records are work-related decisions and actions including emails, charts, presentations, briefing notes, etc. OBRs show:

- what happened,
- when,
- who was involved,
- what was decided or recommended and by whom.

OBRs provide evidence of City decisions and decision-making, policies, procedures, services, operations (including transactions, activities, etc.).

OBRs must be captured and classified in RMS or BIMS, if they are not already captured in SharePoint Online or other City business-specific system.

Industry standards estimate that about one out of ten staff emails are likely OBRs. In contrast, about nine out of ten emails sent from the Senior Leadership Team are likely to be OBRs.

Temporary Records

Temporary records are of limited usefulness and can be destroyed immediately or when no longer needed. A temporary record:

- is of limited usefulness, created or received by staff in carrying out their activities,
- has no value beyond an immediate and minor action and are not required to meet legal or fiscal obligations,
- is often created in preparation of a subsequent OBR (e.g. a draft of a completed report), and
- does not provide evidence of decision-making or work-related operations (including transactions, activities, etc.).

Why Classify Records

Every OBR is classified under the Corporate Records Classification Schedule (CRCS) for two reasons:

- the classification schedule helps staff in finding records by grouping similar information together, and
- each classification is associated with a retention schedule and disposition action which defines how long OBRs are kept and what happens to them when their retention has been met.

Information Management (IM) staff can help with classifying records.

Where do we Capture our Official Business Records?

The official recordkeeping systems at the City are:

- RMS for the capture of physical records such as paper, mylar, DVDs,
- BIMS or SharePoint Online (with recordkeeping configurations in place) for the capture of electronic records.

Many program areas use business-specific systems to create and manage their records. Business-specific systems can be evaluated by IM to identify any records related risks. Business systems should meet specific records requirements such as:

- unalterable records,
- unalterable audit log of actions on records, and
- record retention and disposition functionality.

The following are work environments and not recordkeeping systems and should not be used to keep OBRs:

- OneDrive, shared and local drives (S: and H: drives),
- Outlook and PSTs (email folders), and
- removable storage devices.

OBRs found in these locations should be moved to BIMS or SharePoint Online.

Messaging applications and social media platforms are not recordkeeping systems and should not be relied upon to be the sole documentation of key decisions. Messaging applications include, but are not limited to: text messaging, Teams Chats, Jabber, Twitter, etc.

If you communicate key decisions, based on your role and delegated authority, via messaging applications or social media platforms, you must save the decisions as OBRs in BIMS or SharePoint Online. Depending on the application you are using, there may be technical solutions available (such as screen grabs) that will allow you to capture the decision. An alternative is to simply document the decision elsewhere in a more formal setting (such as in an email, memo or meeting minutes), then make sure that record is captured in BIMS or SharePoint Online.

Responsibilities

All City staff have the following responsibilities:

- know and apply this policy,
- identify all OBRs. Classify them. Capture them in RMS, BIMS, SharePoint Online or an appropriate business application,
- dispose of temporary records in a timely fashion. If staff are finished with a temporary record, and there is no business need to keep it, delete it. Failing to do so makes the important information harder to find and can create additional storage expense,
- not to keep OBRs in shared drives, OneDrive, Outlook or removable storage devices, and
- if there are changes to City business, and staff require new classifications, contact IM staff. They can assist by creating new classifications.

All Managers have the following responsibilities:

- make sure your staff know and comply with this policy, including providing records management training opportunities,
- ensure your workplace procedures include appropriate plans and resources to capture and classify all OBRs. Contact IM staff if you require assistance,
- some classifications are restricted or contain personal information and require additional controls. Managers are asked to work with IM staff on creating appropriate procedures to ensure these files are safeguarded,
- when records are eligible for disposal under the Records Retention and Disposition By-law and require your authorization, respond to the request in a timely fashion, and
- if there are changes in legislation, guidelines, or in your business process that affects the length of time a record needs to be kept, contact IM staff. They can assist by changing record retention periods.

Senior Leadership Team (City Manager, City Clerk and GMs) are responsible for promoting compliance with this policy.

City Clerk is responsible for the IM and Archives Programs, which includes submitting an annual report to City Council. For transparency, the City Clerk will inform City Council of any approved changes to the Records Management Policy as part of the annual report.

City Council is responsible for enacting the Records Retention and Disposition By-law and amendments.

The Program Manager, Information Management is responsible for:

- managing the Records Management Policy, Records Retention and Disposition By-Law and the Corporate Records Classification taxonomy,
- ensuring that records classifications are developed to meet operational requirements, applicable federal and provincial statutes and regulations, and by-laws and policies approved by City Council,
- supporting City Departments with their records management obligations by providing records systems, IM staff resources, records services, guidance and best practices, and providing IM training opportunities, and
- managing disposition services to ensure the timely and cost-effective disposition of the City's records according to the Records Retention and Disposition By-Law.

The City Archivist is responsible for:

- conducting periodic archival appraisals and reviews of OBRs, identifying records of archival value, and authorizing their transfer to the City Archives,

- establishing and maintaining disposition authorities, to enable the timely and cost-effective disposition of the City's records,
- protecting records with archival value from destruction, unauthorized use, access or disclosure in accordance with applicable federal and provincial statutes and regulations, and by-laws and policies approved by City Council, and
- serving as advocate for, and official representative of, the corporate memory, and interpreting the City's enduring historical legacy.

The Manager, Policy and Business Operations in the Office of the City Clerk, is responsible for ruling on any disputes resulting from archival reviews.

Monitoring/Contraventions

City employees who fail to comply with this policy may be subject to disciplinary and/or legal action, as deemed appropriate.

References

Electronic Records as Documentary Evidence. The Canadian Standards Board – CAN/CGSB-72.34-2017
Employee Code of Conduct
ISO 15489-1:2016 Part 1: Records Management
Responsible Computing Policy
Records Management Procedures

Legislative and Administrative Authorities

City of Ottawa Records Retention and Disposition By-law
Municipal Act, 2001
Municipal Freedom of Information and Protection of Privacy Act, 1990
Ottawa Official Plan (Arts and Heritage Plan)
Personal Health Information Protection Act, 2004
Public Sector and MPP Accountability and Transparency Act, 2014

Definitions

Archives – the City of Ottawa Archives.

Archival Value – those civic records that the City Archivist has identified for transfer to the City Archives for preservation because of their enduring value and/or historical significance to the City of Ottawa and its residents.

Auditor General – the person or firm appointed by Council under Subsection 223.19 (1) of the *Municipal Act, 2001*. The Auditor General, is entitled under Subsection 223.20 to have access to "all books, accounts, financial records, electronic data processing records, reports, files and all other papers, … belonging to or used by the municipality."

Corporate Records Classification Scheme (CRCS) – is an information taxonomy that represents information collected or generated by all business functions of the City.

Disposition Authority – provides for the routine disposition of Official Business Records. A disposition authority may be modified whenever legislative context or retention periods change, significant organizational changes occur, or business processes change.

Disposition – includes:

- the secure, authorized destruction of records,
- the transfer of records of archival value to the City Archives, or
- the permanent retention of records by the IM Branch.

Official Business Records (OBRs) are work-related decisions and actions including emails, charts, presentations, briefing notes, etc. OBRs show:

- what happened,
- when,
- who was involved,
- what was decided or recommended and by whom.

OBRs provide evidence of City decisions and decision-making, policies, procedures, services, operations (including transactions, activities, etc.).

Records Systems – systems that are officially recognized by the City for the recording, storage and management of OBRs. The corporate record repositories are: Records Management System (RMS) for physical records, and Business Information Management System (BIMS) or SharePoint Online (with recordkeeping configurations in place) for electronic records. The following are not acceptable storage locations for the City's OBRs:

- OneDrive, shared and local drives (S: and H: drives),
- Outlook and PSTs (email folders) and
- removable storage devices.

OBRs found in these locations should be moved to BIMS or SharePoint Online.

Temporary Record – Temporary records are of limited usefulness, created or received by staff in carrying out their activities. They have no value beyond an immediate and minor action and are not required to meet legal or fiscal obligations. Temporary records

are often created in preparation of a subsequent Official Business Record, for example, a draft of a completed report. They do not provide evidence of decision-making or work-related operations (including transactions, activities, etc.). Temporary records may be deleted or otherwise destroyed on the same day that the records are created or received or when no longer needed.

Enquiries

For more information on this policy, contact:

Program Manager, Information Management
Office of the City Clerk
Tel: 613-809-1634

For more information about the role and responsibilities of the City Archives, contact:

City Archivist
Office of the City Clerk
Tel: 613-580-2424, ext. 13181