



The Corporation of the Town of LaSalle Policy Manual

Records and Information Management

Policy Manual Section: Governance – General

Policy Number: G-GEN-007

Authority: 113/17, 376/18

Date Approved: March 28, 2017

Department Responsible: Council Services

Revision Date: October 9, 2018, April 30, 2020

Review Date: November 2024

Status: Active

1. Purpose

The purpose of the Records and Information Management Policy is to establish a framework for efficiently and effectively managing records of all formats. The records and information management program will ensure that the Town of LaSalle maintains, preserves and disposes of records in accordance with fiscal, operational, legal and regulatory requirements and in accordance with historical/archival needs. This policy will be a means of facilitating good record keeping practices and aims to foster accountability and transparency in records and information management.

2. Policy Statement

The Town of LaSalle is dedicated to proper maintenance, preservation and disposition of records created, captured, received and maintained by the Town of LaSalle. The Town of LaSalle recognizes that records are valuable corporate assets and that access, preservation and security must be ensured throughout the records life cycle. Effective records management contributes to the overall operation and decision making of the municipality by maintaining records deemed to have fiscal, legal, regulatory, administrative, operational, evidentiary or historical value.

3. Scope

This policy applies to all municipal records created, captured, received and maintained by the Town of LaSalle, regardless of format. This policy applies to all Town of LaSalle employees who create, capture, receive or maintain records and information for the Town of LaSalle.

4. Definitions

Active Records



Records that are consulted regularly. These records are stored in the departmental area or at an employee workstation for convenience.

Archival Records

Records that have been appraised and deemed to have enduring historical value.

Archival Review

An evaluation of records for potential archival value conducted by Records Management.

Archive

A repository of archival records that have been appraised for permanent retention.

Classification System

A systematic means of coding, categorizing and arranging records for use, retrieval and retention purposes.

Copy

Refers to a duplicate copy of an original record.

Destruction

Refers to the permanent deletion or obliteration of records, regardless of format. Methods for physical destruction of records include shredding and recycling. Records containing personal or sensitive information shall be destroyed in a secure manner.

Digitization

The process of converting physical documents into electronic form, by scanning or imaging of physical records such as paper documents, photographs, drawings, plans, etc.

Disposition

The final stage of the records life cycle. Records may be destroyed, retained permanently, or archived for preservation.

Inactive Record

A record that is no longer consulted on a regular basis, but is retained to fulfil legal, regulatory and operational requirements, or historical need.

Official Record

A record providing documentary evidence of the activities, rights, obligations and responsibilities of the Town of LaSalle. Recorded information that was created, received, distributed or maintained by the company in compliance with a legal obligation.

Permanent Record

A record with permanent retention due to its ongoing administrative, historical, fiscal, legal or operational value.

Record

All recorded information, regardless of structure or form, created, captured, received or maintained by the municipality and which serves as documentary evidence of daily activities. Records are valuable corporate assets of the Town of LaSalle. Records may include, but are



not limited to: correspondence, email, memoranda, invoices, minutes, photographs, maps, plans, drawings, microforms, books, reports, etc.

Records Life Cycle

The life span of a record from creation, receipt or capture, through active, semi-active and inactive stages, to final disposition.

Records Liaison

A designated individual within each department serving as a liaison between the department and records management.

Records Management

The planning and systematic control of the creation, capture or receipt, maintenance, use and final disposition of records.

Records Series

A group of related documents that are filed together for retrieval and retention. This group is assigned an identifying code and title.

Retention Period

The period of time that records must be kept to fulfill operational, legal, regulatory, fiscal or other requirements before they are eligible for final disposition.

Retention Schedule

A control document defining the record series (categories) and the period of time each series must be kept. This document will be used to classify records and establishes legal authority of the destruction of records after the retention period has expired.

Signing Authority

Refers to the Department Head or designate.

Transitory Records

Records having only temporary or limited usefulness or have been used in the preparation of a record. Often maintained for the completion of a routine task or in preparation of other records and are not required for operations or statutory obligations. Examples include working papers, external publications, duplicate copies, etc.

Vital Records

Records essential to resumption or continuation of operations after an emergency or disaster; those necessary to recreate the corporation's legal and financial position; and/or those necessary to preserve the rights of the corporation, its employees, customers, and ratepayers. Examples of vital records include accounts receivable / accounts payable records, tax rolls, contracts and agreements, By-Laws, policies and procedures, etc.



5. Policy

5.3 Records Ownership and Custody

- i. All records created, captured, received and maintained in the course of Town business are property of the Town of LaSalle and subject to all policies and By-Laws governing records and information.
- ii. Employees leaving their position at the Town of LaSalle will leave all Corporate Records to their successor or supervisor including, but not limited to, physical, electronic and email records. This also applies to transfers within the organization and temporary leave.

5.2 Records and Information Management Program

The Municipal Act, 2001 outlines that municipalities are responsible for maintaining and preserving records in a secure and accessible manner (2001, c. 25, s. 254 (1)). The establishment of a formal records and information management program will ensure Corporate-wide application of procedures and legal defensibility of records practices.

The objectives of the Records and Information Management Program shall be to:

- i. Establish and maintain a framework of good record keeping practices to support the operational, fiscal, legislative, regulatory and historical needs of the Town of LaSalle.
- ii. Establish clear and consistent procedures for records and information management.
- iii. Educate departments and divisions on the importance of proper records management, Corporate-wide consistency and availability of assistance.
- iv. Ensure that creation, management, storage and disposition of records is carried out in accordance with established procedures and in accordance with the Records Retention and Disposition By-Law.
- v. Ensure legal and regulatory compliance.
- vi. Ensure the preservation of the authenticity and integrity of records.
- vii. Identify and preserve records deemed to have permanent or archival value and those deemed to be vital records.
- viii. Establish accountability and responsibility for records management at all levels.
- ix. Provide input on topics effecting the management of information.

5.2.1 Records Management Procedures

The Records Management Manual will provide guidelines for the creation, capture, management, retrieval, storage, access and security of records throughout the records lifecycle. This manual will include information on all aspects of the records management program and identify all procedures or procedural documents for records management functions.

5.2.2 Departmental Training and Assistance

Departmental training sessions and assistance will be offered as time permits. The records management manual, training aids, and the records retention schedule will be made available to each department.

Assistance will be available in the following areas:



- i. Records and information management basics
- ii. The records retention schedule, classification and destruction of records
- iii. Records and information management policies and procedures
- iv. Security and access of records and information
- v. Laserfiche software and workflow assistance
- vi. Records storage
- vii. Digitization of records
- viii. Departmental records and information solutions

5.2.3 Compliance Audits

Periodic scheduled and un-scheduled compliance audits will be conducted to ensure the application of established records and information policies, by-laws and procedures.

5.3 Records Classification

- i. All Corporate Records will be classified and disposed of in accordance with the current Records Retention By-Law.
- ii. When records cannot be classified according to the Records Retention Schedule, the records management clerk will perform a records analysis in order to obtain information on operational needs, legislative requirements and potential historical value. The records management clerk will then provide guidance and make any necessary amendments to the Records Retention Schedule, subject to approval.

5.4 Records Retention and Destruction

Municipalities can destroy records, provided that a retention/classification schedule is in place, that the specified retention has expired, or if it is a copy of the original record (*Municipal Act*, 2001, c. 25, s. 255 (2); 2006, c. 32, Sched. A, s. 109 (1)). The retention periods set out in the Town of LaSalle's Records Retention By-Law are based on The Ontario Municipal Records Management System (TOMRMS). Retention periods also take into account current usage, legal and regulatory requirements, operational, fiscal and archival needs.

5.4.1 Records Storage

- i. The Town of LaSalle maintains a decentralized records storage system, meaning that each department is responsible for the storage of records within their care.
- ii. Where records are transferred to departments or off-site storage facilities for storage, a Records Transfer Form must be completed (**See Intranet**).
- iii. Town of LaSalle employees should ensure that Official Records within their custody remain accessible for the entire records life cycle, as set out in the Records Retention By-Law.
- iv. Personal Drives and Desktops should not be used for the storage of Official Records.
- v. Outlook accounts are working environments and not record keeping systems. Outlook should not be used as a records storage system. Emails deemed to be Official Records



shall be classified according to the Records Retention By-Law and stored to ensure accessibility for the entire records life cycle.

5.4.2 Destruction of Records

- i. The Town of LaSalle Records Retention By-Law sets retention periods and governs the destruction of records. The current Retention Schedule is available in the Clerk's Department. Departmental Retention Schedules will be developed based on our Retention By-Law and in consultation with the department.
- ii. Records that have been categorized according to the Records Retention Schedule may be destroyed if:
 - a. the retention period has expired
 - b. the record is a copy of the original record, provided there are no notations on copy retention for that record series
- iii. Records must be destroyed promptly upon expiration of the retention period. Records that have expired, but have not been destroyed, put the Town of LaSalle in a position of risk. If records are destroyed promptly and routinely, we can establish legal defensibility of records destruction practices at the Town of LaSalle.
- iv. The following procedure shall apply for destruction of records:
 - a. Records destruction, in compliance with the Records Retention By-Law, requires a completed Records Destruction Form signed by the Department Head or signing authority and the Records Management Clerk prior to the destruction of the records (**See Intranet**).-This form shall be retained permanently by the Records Management Clerk.
 - b. A certificate of destruction, provided by the secure records destruction vendor, must be forwarded to the records management clerk for storage with the Records Destruction Form. Stored together, the records destruction form and certificate of destruction provide legal proof that a record has been destroyed.
 - c. All records containing personal information must be destroyed in a secure and confidential manner. This includes physical, electronic and transitory records.
- v. Destruction of physical records after digitization is governed by processes which ensure the authenticity and integrity of records (See Section **5.6.1 Digitization Programs**)
- vi. Back-up copies may not be used to fulfill long-term or permanent retention requirements.
- vii. Records shall be destroyed in a secure manner protecting the privacy or information contained therein.
- viii. Records destruction will be suspended if subject to ongoing litigation or a request under the Municipal Freedom of Information or Protection of Privacy Act, 2001.
- ix. Records shall not be knowingly destroyed without the proper authority, subject to personal fines as per the MFIPPA.



5.4.2.1 Retention after retention expiration date

- i. In the event of litigation or investigation, routine destruction of records related to the matter will be suspended.
- ii. Where retention of a record for a further period after expiration is required, a Records Retention Authorization Form must be approved (**See Intranet**).

5.4.2.2 Legal Hold

A legal hold is intended to initiate the preservation and suspension of destruction of any records related to certain legal matters. A formal Legal Hold Notice will be issued by the Council Services department to relevant employees and departments. Upon completion of the matter, a formal Legal Hold Release will be issued by the Council Services department.

5.5 Transitory Records

- i. Transitory records have only temporary or short term usefulness, and are often used in the preparation of another record. Transitory records are often used for the completion of a routine task and are not required for operations or statutory obligations. These records are not considered Official Records.
- ii. The records retention schedule shall not apply to transitory records. These can be destroyed when no longer needed and in the course of regular business.
- iii. For example, a report for Council is prepared and saved on the COM (I :) drive. When the report is signed and submitted for the agenda, the copy of the report on the COM (I :) drive is considered transitory and can be destroyed when no longer needed. See below table for more examples.
- iv. All legal holds issued shall also apply to transitory records. When a legal hold is released, routine destruction may resume.

Official vs. Transitory Records

Official Records

- Correspondence, **including email**
- Original Minutes
- Reports
- Agendas
- Permits
- Maps and Plans
- Memoranda
- Policies
- Financial Transactions
- By-Laws
- Personnel Records

Transitory Records

- Duplicate copies
- Convenience Copies



- Drafts with limited importance
- Reference Material
- Personal Files
- Working Papers
- External Publications

5.6 Electronic Records

- i. Electronic records are subject to the same legal, fiscal, regulatory and operational requirements and policies as physical records. Electronic records may be word documents, pdf documents, emails, text messages sent on a mobile device issued by the Town, Town related documents on any computer used by employees to complete work, etc.
- ii. Electronic records including **Email, Voicemail, Social Media and Mobile or chat communications** are records and are therefore subject to the legal, fiscal, regulatory and operational guidelines for records retention.
- iii. Digitization programs will be established to ensure proper standards are adhered to in the digitization of records.
- iv. Data stored on the Town of LaSalle's back-up server shall not be considered a record for the purposes of records retention or requests, and is intended for use only in disaster recovery or system failure.

5.6.1 Digitization Programs

There are requirements for the digitization of records, storage and retention in electronic form. Digitized records are required to meet certain criteria if they are intended to become the authoritative copy of the record. These criteria will ensure the authority, integrity and thereby legal defensibility of electronic-only records.

Physical records which have been digitized are not to be destroyed unless:

- i. The proper authorization for digitization and is obtained, as required by the Canadian General Standards Board 72-11-93.
- ii. Established digitization procedures are adhered to.
- iii. Quality control of digitization is completed.
- iv. Proper authorization for destruction is obtained.

5.7 Archival Records

- i. Archival records will be preserved and stored for long-term preservation.
- ii. Archival records will be created and preserved in formats suitable for the retention period to ensure long-term usability.
- iii. Records subject to archival review will be submitted to the Records Management Clerk for evaluation when the retention period has expired.



5.8 Vital Records

- i. The Town of LaSalle is committed to the identification and preservation of vital records.
- ii. A vital records program will be established to identify and preserve these valuable corporate assets.

5.9 Records Security and Access

- i. Records shall be made available internally only to those who require access.
- ii. Records containing personal information shall be securely stored, preventing unauthorized access.
- iii. The Town of LaSalle will endeavour, where possible, to make records available to the public. Restrictions and exemptions may apply.

6. Responsibilities

6.1 Duties of the Deputy Clerk

- i. Provide leadership and support for the Records and Information Management Program.
- ii. Authorize the destruction of records in compliance with the Records Retention and Disposition Schedule.
- iii. Authorize changes to the records retention schedule.
- iv. Authorize new procedure supporting the Records and Information Management Program.

6.2 Duties of the Records Management Clerk

- i. Administer the Records and Information Management Program, providing assistance in implementation and maintenance.
- ii. Maintain and update the records retention schedule and information management policies.
- iii. Develop and maintain procedures to support the Records and Information Management Program.
- iv. Authorize the destruction, archiving, extended retention and transfer of records.
- v. Conduct departmental assessments and offer training, assistance and recommendations.
- vi. Perform compliance audits.
- vii. Establish goals and timelines for records management initiatives and projects.
- viii. Provide consultation in purchase of software or filing equipment which will effect the storage, retrieval and maintenance of records and information.

6.3 Duties and Responsibilities of Department Heads

- i. Shall be responsible for the records in the care of the department.
- ii. Department Heads or Signing Authorities are responsible for approving departmental records destruction requests.
- iii. Will work with the Records Management Clerk to ensure policies and procedures are applied.



- iv. Will assign a records liaison in each department/division.

6.4 Duties of the Records Liaison

- i. Assist in the implementation of policies, procedure and recommendations at the departmental level.
- ii. Participate in records management training sessions.
- iii. Co-ordinate records storage space, physical and electronic, at the departmental level.
- iv. Arrange for transfer or archiving of records at the departmental level.
- v. Discuss any gaps or omissions in the retention schedule, policies or procedures with the Records Management Clerk for prompt assessment, schedule amendments and changes in policy/procedure.

6.5 Duties of all Employees

- i. Create and maintain complete and accurate records which will serve as evidence of decisions, transactions and business activities.
- ii. Comply with all records management policies, By-Laws and procedures.
- iii. Comply with the file classification systems and retention periods as specified in the current Retention Schedule.
- iv. Ensure records in their custody are properly classified, maintained, preserved and disposed of according to the established retention periods.
- v. Ensure that transitory records in their care are destroyed when no longer required.
- vi. Ensure the security and access of records in their care.
- vii. Ensure that records in their custody are protected from inadvertent damage or destruction.
- viii. Ensure that upon exit or transfer, all records in their custody are transferred to supervisor or predecessor. This includes all physical, electronic and email records.

6.6 Duty to Document

The Town of LaSalle recognizes that key decisions are made and information received in verbal conversations, voicemail messages, chat, and other means that may or may not produce physical records. All employees, including managers and supervisors, are responsible for accurately documenting any key decisions or information not resulting in a record. This must be done in the course of regular business and will provide a valuable record of decisions and context to many projects, files, etc. See [Section 5.6 Electronic Records](#) or the **Records Management Manual** for more on documenting record types.

7. Policy Review

This policy will be periodically updated to reflect the current Records and Information Management Program. This policy must be reviewed by the stated review date and approved by the responsible department.



8. References and Related Documents

By-Laws

Current Records Retention By-Law
User Fees By-Law and amendments

Legislation

Canada Evidence Act, R.S.C. 1985, c. C-5
Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. F.31
Municipal Act, 2001
Municipal Freedom of Information and Protection of Privacy Act, R.S.O 1990

Standards/Regulations

CAN/CGSB-72-034-2022E– Electronic Records as Documentary Evidence
CAN/CGSB-72-11-93E – Microfilm and Electronic Images as Documentary Evidence
Canada Revenue Agency – IC05-1R1 – Electronic Record Keeping
ISO 15489-1:2016(E) – Information and documentation – Records Management, Part 1:
Concepts & Principles
ISO 15489-2:2001(E) – Information and documentation – Records Management, Part 2:
Guidelines
Secure Electronic Signature Regulations (SOR/2005-30)

Related Procedures

Procedure for Processing FOI Requests

Related Documents

Archived Records Index
Controlled Vocabulary Index
Freedom of Information Request Form
Records Management Manual

9. Attachments

None.