SECTION:	**CHIEF ADMINSTRATIVE OFFICE**		POLICY NO. **14.8.1**	
SUBJECT:	**Information Management Policy**			
EFFECTIVE**:** **October 6, 2016**		REPLACES: 14.8.0	PAGE:	**1** of **8**
APPROVED BY: Peter Fay, City Clerk		PROCEDURAL UPDATES: n/a		

POLICY STATEMENT

The purpose of this policy is to establish a comprehensive Information Management program that provides direction on the creation, identification, maintenance, retention, disposal, and safekeeping of information under the control of the Corporation of the City of Brampton (the (City").

To sustain the continuing conduct of business, comply with all applicable legislation and ensure accountability, the City integrates information management into all its business processes and corporate planning activities.

The Information Management program will enable the City to:
- Identify roles, responsibilities, policies and procedures as required to safeguard information reliability and integrity for the purpose of sound business decisions.
- Meet legislative requirements under the *Municipal Freedom of Information and Protection of Privacy Act*.
- Provide evidence of business activity.
- Meet operational requirements.
- Protect the legal, historical and financial interest of the City, its employees and the public.

This policy applies to all information, in all media and formats, created or received by, City Personnel (including managers, elected officials, managers, employees, volunteers of the City, as well as contractors and vendors retained to provide services to the City), in the course of performing their duties.

AIMS AND OBJECTIVES

At the City, information is created, received and used every day. Records are documentary materials created or received by City Personnel in the course of business and are maintained as evidence of business activities. Records may be in many formats such as paper, electronic, and audio, etc., but they are all information resources that are important to perform daily business functions. These records of business value demonstrate the City's activities, policies, procedures, operations and decisions.

To support an effective and efficient Information Management program, the City is committed to recordkeeping in a manner that demonstrates:

a) Accountability & Integrity

Information must be managed throughout its lifecycle by assigning accountability for the effective and efficient use of information to specialist groups and to the user community. Information must be reliable and accurate, and must be a true representation of the actual event or task. Records must not be altered or tampered with in anyway.

b) Protection & Availability

The Information Technology Security Guidelines, along with other City policies and practices provide the means for the City to meet it's legal, regulatory and contractual requirements regarding the protection of information resources at the City. In addition, the City must maintain records and information to ensure the timely, efficient and accurate retrieval of information by City Personnel requiring it for the City's business purposes.

c) Compliance

The City's Information Management program must comply with all applicable legislation, standards, authorities as well as all City policies and practices. Records created must accurately demonstrate the City's business activities and decisions, and must be retained and maintained as prescribed by law.

d) Retention & Disposition

The City's Retention By-law provides direction on which records and/or information to retain and for what length of time. The length of time a record must be kept and be accessible is based on the legal, regulatory, fiscal, historical and business operational requirements of the City.

Records must be securely disposed of immediately following the expiry of their retention periods to mitigate the risk of unauthorized or unnecessary access. The City's Records Retention By-law provides direction on how to dispose of records/ information that no longer have any business value.

e) Openness & Transparency

The public has the right to access information under the control of the City in accordance with the *Municipal Freedom of Information and Protection of Privacy Act*. Employees and the public also

Corporate Policies

SECTION:	**CHIEF ADMINSTRATIVE OFFICE**		POLICY NO. **14.8.1**
SUBJECT:	**Information Management Policy**		
EFFECTIVE**:** October 6, 2016		REPLACES: 14.8.0	PAGE: **3** of **8**
APPROVED BY: Peter Fay, City Clerk		PROCEDURAL UPDATES: n/a	

have the right to access and have any errors corrected in their personal information which the City has in its custody or under its control.

f) Quality Assurance

The City is required to establish and maintain procedures for information quality assurance and the effective management of records. The City will undertake routine assessments of its information quality and records management processes. The City will promote information quality by means of its policies, procedures, and training and awareness initiatives.

Records and INFORMATION MANAGEMENT

Records and Information Management refers to the handling of information resources throughout their lifecycle: from the time they are created/received, while they are used and maintained, until they are preserved or destroyed. The three stages in the lifecycle of a record are:

a) Creation (Receipt)

The City creates or receives records that document its business activities, functions, policies and decisions. Information should be 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.

Records must be created in all instances when there is a need to be accountable for and/or provide evidence of decisions made and/or actions proposed or taken. Records must be accurate, authentic, reliable and complete.

b) Use and Maintenance

Records must be maintained in such a way as to make them accessible to others who require use of the information in the record and must be protected against unauthorized access, disclosure or destruction.

There are three basic steps to managing the City's records:

- Identify records that document Brampton's business activities.
- Capture and maintain records in approved recordkeeping systems
- Retain records according to the City's Records Retention By-law and in keeping with any *Municipal Freedom of Information and Protection of Privacy Act* and *Municipal Act* requirements and/ or Legal Holds.

Corporate Policies

SECTION:	**CHIEF ADMINSTRATIVE OFFICE**		POLICY NO. **14.8.1**
SUBJECT:	**Information Management Policy**		
EFFECTIVE**: October 6, 2016**		REPLACES: 14.8.0	PAGE: **4** of **8**
APPROVED BY: Peter Fay, City Clerk		PROCEDURAL UPDATES: n/a	

Records requiring permanent retention (e.g. Council minutes must be maintained in an accessible format.

c) Disposition
This final stage in the lifecycle of a record occurs when records are no longer of any business value and have reached the end of their prescribed retention periods. They are to be routinely disposed in accordance with the City's Records Retention By-law, to prevent the risk of unauthorized access and use.

Disposition of records can occur in one of two ways:

Destruction – Records are destroyed making the information permanently unrecoverable or unreadable. The most appropriate method for destroying records depends upon the records format.

Archive – Records are transferred to Peel Art Gallery Museum and Archives with instructions to preserve information of historical or cultural value contained in the record.

RECORDKEEPING
The City's Records Retention By-law provides the foundation for organizing City records, based on their business functions and activities. This allows for the consistent application of retention and disposition requirements.

When records are created or received, they must be captured and maintained in an approved recordkeeping system to provide authorized access, and to safeguard information resources. The recordkeeping system used may be for electronic or tangible copy records. Emails and their attachments may also be considered official records if they are made or received in connection with City business.

Not all records created or received by the City have to be maintained as official records. Transitory records can be destroyed or deleted in a timely and effective manner when they no longer have any business value. The Records Decision Tree provides the guidance on how to differentiate between

Corporate Policies

SECTION:	**CHIEF ADMINSTRATIVE OFFICE**		POLICY NO. **14.8.1**
SUBJECT:	**Information Management Policy**		
EFFECTIVE: **October 6, 2016**		REPLACES: 14.8.0	PAGE: **5** of **8**
APPROVED BY: Peter Fay, City Clerk		PROCEDURAL UPDATES: n/a	

records that are official and records that are transitory. Personal documents may be retained or destroyed by the individual whenever they choose.

In order for individuals to access and use official or corporate records, such records must be identified using appropriate metadata to describe the structure, content and context. The metadata used should describe the record in sufficient detail to allow for quick and easy access by authorized individuals. This will include capturing information such as: title of record; description; creator; and retention time frames and disposition actions. This will allow for the proper classification of the record

City business must be performed on official City recordkeeping systems. Employees using instant messaging or other transient technologies for official business must manage corporate messages as official records. The use of social media tools (Facebook, Twitter, etc.), for conducting City business may be limited to activities permitted by and in accordance with the City's policies and procedures. All official digital records (e.g.: email, spreadsheets, presentations, data, images, videos etc.) must be captured and maintained in an approved digital recordkeeping systems (e.g.: shared drives, SharePoint, PeopleSoft, etc.). All paper records must be properly filed and maintained in a secure cabinet or locked drawer.

ROLES AND RESPONSIBILITIES
Chief Administrative Officer

- Establishes the corporate vision, values and strategies that address information as a strategic business asset of the City.
- Ensures the establishment of an effective information management program within the City.
- Ensures employees are aware of their obligation to manage information appropriately.
- Ensures all data protection and security of information policies and procedures are understood, implemented and adhered to.
- Ensures the day-to-day practice and enforcement of the processes outlined in this Policy.

City Clerk

- Ultimate authority for the City's recordkeeping practices and programs.
- Co-sponsor for the City's Records and Information Management System
- Oversees this Policy including (but not restricted to): compliance, coordination of implementation activities, and monitoring results.
- Is accountable for the compliance with the *Municipal Act,* and the *Municipal Freedom of Information and Protection of Privacy Act*, as they address records and information management.
- Provides on-going support on day-to-day activities including: privacy impact assessments, incident management, and access requests.

Executive Director, IT/ CIO

- Resources an information security program that assesses and manages information risks in the enterprise network.
- Investigates any access or security breach including the loss, inappropriate access or unauthorized disclosure of the City's electronic records and information.
- Ensures that retention, disposition, access, and security are an integral part of each stage in the system development lifecycle.
- Safeguards the availability of electronic information through appropriate data backup and recovery practices.

Manager, Records and Information Management

- Business owner of Electronic Document and Records Management System
- Provides leadership, direction and vision for the City's overall Information Management program.
- Raises awareness of Information Management, and promotes compliance with this policy and all related practices and guidelines through training and awareness initiatives.
- Oversee the creation of tools, policies, standards and guidelines related to Information Management.
- Work with Information Technology to obtain and develop software that enables Information Management.

Corporate Policies

SECTION:	**CHIEF ADMINSTRATIVE OFFICE**	POLICY NO. **14.8.1**	
SUBJECT:	**Information Management Policy**		
EFFECTIVE**:** **October 6, 2016**		REPLACES: 14.8.0	PAGE: **7** of **8**
APPROVED BY: Peter Fay, City Clerk		PROCEDURAL UPDATES: n/a	

- Provides advice and support to all business areas on information management processes and requirements.
- Provides authority for Information Management processes, procedures and methodologies and for approving contractors for Information Management services (digitization, shredding, and storage).
- Measures and reports on the overall quality and health of the Information Management program and systems.
- Has administrative access to all City Recordkeeping systems to conduct periodic reviews of the systems and their contents; to ensure compliance with Policies and By-laws; and provide program-specific support including activities such as migration support, and privacy impact assessments.

Department Heads

- Ensures their business processes comply with this policy and current records management best practices.
- Ensures that employees are aware of and follow the Information Management Policy and practices as they apply to their process, including the timely creation of records as well as timely destruction authorization sign-off.
- Ensures a delegate is named as the Records Management Coordinator, and encourages his/her full participation in the Information Management program.

Records Management Coordinators

- Uses the information, guidance and tools found on the internal [Records Management Website](#) to assist in proper information management within the City.
- Actively participates in training and awareness events hosted by the Information Management Team.
- Communicates and trains team members on the proper use of Recordkeeping systems and general handling of records.
- Monitors business area's compliance with this Policy.
- Monitors business area's access permission to electronic recordkeeping systems.

All City Employees

- Ensures familiarity with this Policy and City recordkeeping practices.
- Creates accurate and reliable records to support business activities.
- Protects personal and confidential information throughout its lifecycle.
- Ensures records are stored in a City approved recordkeeping system.
- Retains and disposes of records according to the City's Records Retention By-law.
- Ensures appropriate protection against unauthorized use, loss/theft of records, and should a breach occur, promptly notify the Manager, Records & Information Management.

PRIVACY AND PROTECTION

The City has to collect and use information about people with whom it works with and provides services for. The City of Brampton's Personal Information Protection Policy, Privacy Statement and Information Security Guidelines support the collection, use, retention, disposal and disclosure of personal information, regardless of whether the information is held in hard copy or digital/ electronic form.

REGULATORY IMPACT

- *Municipal Act, 2001*
- *Municipal Freedom of Information and Protection of Privacy Act*

WHERE TO FIND ADDITIONAL INFORMATION

Useful information that may help:

- Electronic Image Management Program – Briefing Note
- Information Technology Use Policy
- Micrographics Imaging Policy
- Accountability and Transparency Policy
- Frequently Asked Questions

Practice Owner: City Clerk
Advisory Services: Manager, Records and Information Management
Feedback/Questions: Click here to e-mail to the contact for this policy.