

**RECORDS AND INFORMATION MANAGEMENT FRAMEWORK POLICY**

Department	Administration	Policy No.	0340-87
Section	Records and Information Management	Date Approved by Board	
Repeals		Board Resolution #	

Amended		Board Resolution #	
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Amended		Board Resolution #	

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1. Purpose

- 1.1 The purpose of the Records and Information Management Framework Policy is to provide a foundation for all Peace River Regional District (PRRD) Records and Information Management (RIM) policies and procedures. This policy is necessary for understanding subsequent RIM documentation and for managing the PRRD's data, information, records and files (information assets).

2. Scope

- 2.1 The RIM policy applies to PRRD Board members, employees, volunteers, and contractors; and to all records and information, electronic and physical, in the custody and/or under the control of the PRRD.
- 2.2 The requirements of this policy apply to any other policy or procedure that deals with or refers to PRRD information assets either expressly or by implication. In the event of a conflict between this policy and any other policy, if the conflict cannot be resolved by the Corporate Services Coordinator, they will bring the conflict to the Corporate Officer for resolution.

3. Definitions

- 3.1 The definitions provided in this policy apply to all PRRD RIM Policies.
- 3.2 *Active* means records that are readily accessible and “related to current, ongoing, or in-process activities and referred to on a regular basis to respond to day-to-day operational requirements.” However, because of the long-term mandate of local government, some of these “current” projects may depend upon records that are ten, twenty, or thirty-plus years old. [2024 LGMA RIM Manual]



- 3.3 *Archival* means a collection of records that are preserved for their historical value. These records are kept on the grounds of their enduring cultural, historical, or evidentiary value. [2024 LGMA RIM Manual]
- 3.4 *Archive* (verb) means to “save digital data, documents, and records, typically those that are not current, offline.”¹ Offline implies a repository which is not immediately available and is located separate from the active, current repositories.
- 3.5 *Archives* (noun) means “a place where records selected for permanent preservation are kept”.²
- 3.6 *Business Hold* means the process by which an organization temporarily halts the normal destruction of a file folder when there is a defined business requirement for the temporary preservation of the files records and information. It is similar to a legal hold and may use the same mechanisms as a legal hold to prevent a file’s destruction. It is important that a business hold be temporary and, if the Corporate Services Coordinator believes the business hold is unnecessary, they may recommend approval of the file folder’s destruction to the Corporate Officer.
- 3.7 *Classification* means the code used to classify a file, and identifies a business function, activity or records grouping and links files classified under the code to a retention schedule.
- 3.8 *Classification Code* means the secondary’s alphanumeric identifier which is applied to a file folder to identify the file as belonging to that secondary.
- 3.9 *Classifying* means applying a classification code to a file folder based on that file’s business function, activity or records grouping.
- 3.10 *Confidential Records* means records that could reasonably harm the interests of individuals, third parties, or the PRRD if disclosed to persons who are not authorized to access the information. This definition also includes personal information.
- 3.11 *Control* means the authority to manage the access, maintenance, preservation, disposition and security of the Regional District's records.
- 3.12 *Convenience Copy* means any copy of a record, other than the official record, required for short term purposes. A convenience copy typically resides in an office that is not the custodian of the official record (see Office of Primary Responsibility). Convenience copies are considered transitory records and may be destroyed without formal approval unless a legal hold prevents such destruction.

¹ Glossary, The InterPARES 2 Project, <http://www.interpares.org/>, May 16, 2022.

² Glossary, The InterPARES 2 Project, <http://www.interpares.org/>, May 16, 2022.



- 3.13 *Convert/Conversion* means the process of changing records from one medium to another (i.e., paper to digital) or from one format to another (i.e., .docx to .pdf) in accordance with international standards.
- 3.14 *Corporate Record* includes any record, official or transitory, received, created or in the custody or control of the PRRD which is related to the administration and operation of the Regional District.
- 3.15 *Custody* means having physical possession of an information asset, whether it is the physical record or file folder or the electronic media on which information is stored. Custody includes responsibility for accessing, maintaining, preserving, disposing of, and securing Regional District data, information, records and file folders.
- 3.16 *Database* means “a common type of electronic [information] system, consisting of a number of structured “fields” where pieces of information are stored, and can be sorted, manipulated, and retrieved in different ways for a variety of purposes. Complex databases re-use information and then display and print it in any number of combinations with other information, thereby creating electronic records.”³ A coherent set of fields within a database may be considered a record (e.g., all the information related to a single invoice is essentially an electronic record of an invoice). A collection of records within a database may be considered a file folder (e.g., the invoices for a fiscal year which are all related to an Accounts Payable account is essentially an electronic file). File folders within a database need to be managed in the same way that a physical file folder in a cabinet or an electronic file in a shared drive structure needs to be managed.
- 3.17 *Digital signature* means a type of electronic signature that has encrypted digital codes used to verify the identity of the individual providing the signature. The encrypted digital codes are almost always provided by a third-party authentication platform.⁴ (See also Electronic Signature.)
- 3.18 *Disaster* is a present or imminent calamity that impacts the PRRD and meets the following criteria:
- a. It is caused by natural forces (e.g., earthquakes, floods, wildfires, severe storms) or human-related events such as accidents, fires, explosions, cyber-attacks, data

³ *Records Management Glossary*, Government of British Columbia, <https://www2.gov.bc.ca/gov/content/governments/services-for-government/policies-procedures/government-records/glossary>, May 19, 2022

⁴ “If there is a requirement under law for the signature of a person, that requirement is satisfied by an electronic signature.” *Electronic Transactions Act* (SBC 2001, c. 10, s. 11). See also sections 34–48 of the *Personal Information Protection and Electronic Documents Act* (PIPEDA) (SC 2000, c. 5), *Secure Electronic Signature Regulations* (SOR 2005-30) and section 31.4 of the *Canada Evidence Act* (RSC 1985, c. C-5, s. 56).



breaches, system intrusions, ransomware incidents, technical failures, or critical infrastructure breakdowns.

- b. It results in serious harm to public health, safety, or welfare, or causes widespread damage to PRRD property, assets, or essential services.

3.19 *Disposition* (see Final Disposition).

3.20 *Email* is any communication created, sent or received on an electronic mail system. This includes any attachments and all associated transmission and receipt data. Email messages include those sent or received to, from or within the organization.

3.21 *Electronic communication* is any texts and/or social media posts that are related to PRRD operations or activities, and they are to be considered records for the purposes of the RIM Policies.

3.22 *Electronic signature* means either an electronic image of an individual's name added to an electronic document or the individual's name which has been added to an electronic document or form by typing the name. For the purposes of the PRRD, electronic signatures are not automatically legally admissible. For legally admissible electronic signatures, a Digital Signature should be employed.

3.23 *File* means any collection of records which has been contextually associated through the file's subject. Each file is uniquely identified by its classification code and by the name of the subject (e.g., name of project or employee or agreement or account). Files are tracked according to various metadata such as owner, location, status and retention period. Files may be physical or electronic. Electronic files are referred to as a File Folder or simply as a folder to differentiate from the common IT use of the term "file" which refers to an individual electronic record.

3.24 *Final Disposition* means the phase within the RCRS when records are reviewed, and a decision is made to either destroy or retain them permanently.

3.25 *Inactive* means records whose value and use by staff for daily work have diminished but are required by the organization to satisfy a regulatory, audit or secondary value. These are sometimes referred to as semi-active records. [2024 LGMA RIM Manual]

3.26 *Information* means data specifically organized for a purpose.

3.27 *Information assets* means the data, information, records and files, electronically or physically recorded, which are in the custody or control of the PRRD.

3.28 *Information Security Incident* means any adverse physical or electronic event where some aspect of information security could be threatened, including but not limited to



loss of data or information; loss of records confidentiality (e.g., data is not lost, but has been exposed); or disruption of data or system integrity (e.g., through viruses, hacking or denial of service attacks).

- 3.29 *Legal Citations* means the codes used to connect the records classification and retention schedule's secondaries with legislation and regulations that have impacts on the RCRS's classifications and retention periods.
- 3.30 *Legal Hold* means the process used by the PRRD to stop any tampering, modification, withholding, fabrication or destruction of PRRD controlled records or information assets whether intentional or accidental, that may be required or considered as evidence when legal action is reasonably anticipated or has been initiated.
- 3.31 *Lifecycle* means the stages of life for a record, including the capture, filing and availability of records for business purposes, the systematic and controlled disposal of records once their value to the organization has ceased and the preservation and continued availability over time of those records with enduring value to the organization. [2024 LGMA RIM Manual]
- 3.32 *Mobile Device* means a small, handheld computing device capable of creating and transmitting data, text, or electronic files, including laptops, tablets, and smartphones.
- 3.33 *Metadata* means information or data that is about, or interprets, other information or data. Records and Information Management examples include file names, authors of documents, time stamps, locations of files, access and permission levels, etc.
- 3.34 *Migrate/Migration* means the act of moving records either from one system to another, or within the same system, while maintaining the records' authenticity, integrity, reliability and usability, in accordance with international standards.
- 3.35 *Non-Work-Related Records* are records concerning the personal lives of employees, volunteers or Regional Board members. These records do not pertain to any aspect of corporate business. Typical examples of non-work-related records are personal e-mails and letters; records of other organizations with which an individual is involved, but not as part of the organization's business (e.g., charities, associations, and community organizations); and records related to non-work activities such as lunch arrangements, social functions, etc.
- 3.36 *Office of Primary Responsibility (OPR)* is the Corporate Administration department, which manages and maintains custody of the official record. Copies of official records are considered convenience copies.
- 3.37 *Official Record* refers to the official copy of a PRRD record that is retained by the Office of Primary Responsibility (OPR) for legal, fiscal, operational, or historical purposes. It



exists to fulfill long-term financial, legal and audit requirements. It can be the original and only copy of the record or a replacement copy that is designated as official. Electronic records which are created or received electronically (i.e., not a scan of a physical record) are considered official and legally admissible. Legal considerations for electronic media, as defined by the *Electronic Transactions Act* (SBC 2001, c. 10, s. 3-12) and the Canadian standard, *Electronic Records as Documentary Evidence* (CAN/CGSB-72.34, 2024) must be satisfied before an electronic scan of a record may be designated as official.

- 3.38 *Permanent Retention* means a record that has been determined by the organization to have sufficient historical, administrative, legal, fiscal, or other value to warrant continued preservation by the organization. [2024 LGMA RIM Manual]
- 3.39 *Personal information* is as defined in the latest version of the *Freedom of Information and Protection of Privacy Act*.
- 3.40 *Personally Identifiable Information* (PII) (see Personal Information).
- 3.41 *Primary* means a set of secondaries gathered together in the records classification and retention schedule, usually according to business function. (See also Secondary.)
- 3.42 *Privacy Breach* means any collection, use, disclosure, access, disposal, or storage of personal information, whether accidental or deliberate, that is not authorized by the PRRD *Freedom of Information and Protection of Privacy Administration Bylaw* or under the guidelines of *Freedom of Information and Protection of Privacy Act* (RSBC 1996, c. 165). It is a type of an Information Security Incident.
- 3.43 *PRRD Records* means recorded information in any form or medium, received, created or owned by the PRRD related to the business functions and operations of the PRRD and kept as evidence of such activity. PRRD records are required to control, support, or document the delivery of programs, business operations, decision making, or accounting for the activities of the Regional District. Examples include agreements, books, charts, diagrams, forms, images, invoices, letters, maps, memoranda, photographs, plans, returns, statements, vouchers, and electronic mail.
- 3.44 *PRRD Records and Information Management* means systematic control over Peace River Regional District information assets throughout their life cycle. This includes the processes and activities involved in creating, capturing, registering, classifying, indexing, storing, securing⁵, retrieving, sharing, using, approving and monitoring access to, disposing of PRRD records and developing ways to manage these functions for departments.

⁵ In partnership with the Information Technology department.



- 3.45 *Record* means information recorded in any form, including written, photographed, recorded or stored in any manner. The *Interpretation Act* (RSBC 1996, c. 238, s. 29) defines a record as "books, documents, maps, drawings, photographs, letters, vouchers, papers and any other thing on which information is recorded or stored by any means whether graphic, electronic, mechanical or otherwise." Sub-categories of records include Confidential, Corporate, Non-Work Related, Official, PRRD and Transitory.
- 3.46 *Records Classification and Retention Schedule (RCRS)* means a formal system, as amended from time to time, that establishes the classification system and retention periods for the records of the organization based on the current edition of the Records Management Manual prepared by the Local Government Association of BC. [2024 LGMA RIM Manual]
- 3.47 *Records Management program* is the sum total of all the PRRD data, information, records and file management functions and supporting resources, including personnel, records classification and retention schedules, policies and procedures, forms, training, software and storage facilities, but not the physical and electronic information assets.
- 3.48 *Regional Board* means the Peace River Regional District Board of Directors.
- 3.49 *Retention Schedule (or Retention Period)* means a comprehensive list of record series titles, indicating for each series the length of time it is to be maintained and also provides a timetable and consistent procedures for maintaining the organization's records, moving the records to inactive storage when appropriate and destroying records when they are no longer valuable to the organization or succession to permanent business storage or archive. [2024 LGMA RIM Manual]
- 3.50 *Secondary* means a category in a primary that defines a function, activity or collection of records that have a records schedule assigned to them. Each secondary has a classification code which is used to tag file folders classified under that secondary.
- 3.51 *Semi-active* (see Inactive).
- 3.52 *Source Record* means a physical record used in data entry or scanning (i.e., digital reproduction). All information from a source record must be captured before it may be considered completely duplicated. Once all the information from a source record is reliably captured, depending on the organization's scanning policy and procedures, it may be considered a Transitory Record.
- 3.53 *Storage* means placing file folders which are unlikely to be accessed regularly into a secure location, ensuring the files are protected from damage, decay, tampering or unauthorized access. Storage may take place during any stage of the retention schedule but is most common when files are closed.



- 3.54 *Transfer* means giving over the ownership, custody and control of a file folder. Once a transfer has occurred, the PRRD has no control over the file and the new owner may manage the records as they see fit.
- 3.55 *Transitory Records* are records of temporary usefulness that are needed only for a limited period of time, to complete a routine task, or to prepare an ongoing document. They are not required to meet statutory obligations or to sustain administrative or operational functions. Once they have served their purpose, they may be destroyed without additional approval. Convenience copies, periodicals, drafts and non-work-related records are examples of transitory records. Transitory records are subject to Freedom of Information (FOI requests, litigations and legal holds).
- 3.56 *Vital Record* means records that are essential for the ongoing business of the PRRD. Without these records, the Regional District could not continue to function effectively. Vital records must be recoverable and accessible after a disaster. Vital records are identified in the RCRS.

4. Policy

- 4.1 The information assets of the PRRD are valuable resources, necessary for the responsible and efficient administration and operation of the PRRD, and, as such, must be treated in a responsible manner. All records created or received by the Regional Board, Regional District employees, or through contractual agreements are owned and controlled by the PRRD.
- 4.2 Any failure to comply with RIM policies or procedures may be investigated, internally or externally, as circumstances dictate. Accidental and negligent contravention of RIM policies or procedures will require explanation of the breach and further training to prevent future contraventions. Willful contravention of RIM policies or procedures may result in disciplinary action, termination of contract and/or criminal prosecution.
- 4.3 Regional Board members, employees, volunteers, contractors and consultants are required to immediately report breaches of RIM policies and procedures to Corporate Administration.

5. PRINCIPLES

- 5.1 The PRRD RIM policies and procedures shall be consistent with the Information Governance Principles (IG Principles or simply "Principles") outlined in ARMA International's Generally Accepted Recordkeeping Principles¹. These Principles shall be applied to all PRRD RIM policies and are listed as follows:
- Accountability
 - Transparency

¹ ARMA International *Implementing the Generally Accepted Recordkeeping Principles*[®], 5th Ed. (ARMA International TR 30-2017).



- Integrity
- Protection
- Compliance
- Availability
- Retention
- Disposition

6. RELATED DOCUMENTATION:

6.1 Legislation

- c. *Canada Evidence Act* (RSC 1985, c. C-5)
- d. *Electronic Transactions Act* (SBC 2001, c. 10, s. 3-12)
- e. *Freedom of Information and Protection of Privacy Act* (RSBC 1996, c. 165)
- f. *Freedom of Information and Protection of Privacy Administration Bylaw No. 2452, 2021*
- g. *Interpretation Act* (RSBC 1996, c. 238, s. 29)
- h. *Records Management Bylaw No. 2553, 2024*

6.2 Standards

- a. *Electronic Documents as Documentary Evidence* (CAN/CGSB 72.34 2024)
- b. *Generally Accepted Recordkeeping Principles* (ARMA International, www.arma.org, February 20, 2009)
- c. *Information and Documentation (Records Management)* (ISO 15489-1: 2016)
- d. *2024 LGMA Records and Information Management Manual, Sixth Edition* (Local Government Management Association, 2024)
- e. The Sedona Conference, *Commentary on Legal Holds, Second Edition: The Trigger & The Process*, 20 SEDONA CONF. J. 341 (2019)

Affiliated Policies	Records and Information Management Accountability Policy 0340-88 Records and Information Management Policy 0340-89 Legal Hold Policy 0340-90 Vital Records Policy 0340-92 Data Backup and Auto Deletion Policy 0340-94 Records in Regional Board Custody 0340-95
Affiliated Procedure	