

**RECORDS AND INFORMATION MANAGEMENT POLICY**

Department	Administration	Policy No.	0340-89
Section	Records and Information Management	Date Approved by Board	
Repeals		Board Resolution #	

Amended		Board Resolution #	
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1. Purpose

- 1.1 The purpose of the Records and Information Management (RIM) Policy is to ensure the correct and consistent handling and tracking of the Peace River Regional District's (PRRD) data, information, records and file folders. Data, information and records require proper filing; file folders require proper classification and proper retention (with or without onsite or offsite storage); and file folders require disposal by destruction, permanent storage or transfer.

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 This policy covers the receipt, creation, filing, classification, transfer, destruction, onsite and offsite storage, and retrieval or return of active, inactive, and permanently retained file folders, in both physical and electronic format.

3. Definitions

- 3.1 See RIM-01 Records and Information Management Framework Policy for definitions.

4. Policy

- 4.1 Filing of Records and Classifying of File Folders
- a) As soon as possible after receipt or creation, PRRD data, information or records shall be filed in a file folder (digital or physical) which has been classified according to the PRRD Records Classification and Retention Schedule (RCRS). The only exceptions are transitory records which may be destroyed without filing or classification. See [Appendix A: Understanding Official and Transitory Records](#) for more information on transitory records.



- b) When an individual is no longer employed, or an elected official's or a volunteer's involvement with the PRRD has concluded:
 - i. All PRRD records in their custody which have not been filed must be filed in a properly classified file folder located within a PRRD file repository.
 - ii. Any transitory records will be destroyed.
 - iii. With the exception of publicly available Regional District records, any PRRD records must be removed from personally owned computer systems, mobile devices and storage media.

4.2 Disposition of File Folders

- a) Once the retention schedule as defined by the PRRD RCRS has elapsed, properly classified PRRD file folders shall be disposed of by being permanently retained, destroyed, or transferred. The only exceptions are files retained under legal holds and reasonable business holds.

4.3 Storage of Physical File Folders

- a) PRRD physical file folders shall be properly inventoried, tracked, and authorized by the Corporate Services Coordinator before being stored. Storage covers storage of active and inactive files and permanent retention storage.
- b) When storing, retrieving, or returning PRRD file folders, the access process and details shall be managed by the Corporate Services Coordinator to ensure the records are reasonably safe from destruction, damage, theft or unauthorized access.
- c) Whether onsite or offsite, PRRD's physical files shall be stored in a manner that ensures they are reasonably safe from destruction, damage, theft or unauthorized access, yet are able to be easily and safely accessed by authorized personnel.
- d) Offsite storage facilities must strive to meet industry standards and onsite storage should strive to meet basic standards. See RIM-03a Basic Storage Standards for more information on proper physical storage conditions.

4.4 Storage of Electronic File Folders

- a) Inactive and permanently retained electronic PRRD file folders should be sequestered and protected with read only access protocols to prevent intentional or accidental changes to inactive records.
- b) PRRD electronic records managed or stored for longer than a ten-year term shall be stored in a format that preserves the authenticity and integrity of their records or, as time passes, these records shall be converted in a manner and format that preserves their authenticity and integrity.
- c) PRRD electronic information, data or records, especially personal information, shall not be stored or managed
 - i. in any systems that are or may be (e.g., emergency backups or service sharing) outside Canadian borders unless a Privacy Impact Assessment¹ has been

¹ *Freedom of Information and Protection of Privacy Act* (RSBC 1996, c. 165, s. 33.1)

Personal Information Disclosure for Storage Outside of Canada Regulation (BC Reg 294/2021, s. 2)



completed and the Corporate Services Coordinator is satisfied that the risk is acceptable.

- ii. on “personal” folders or drives.
- iii. on jump drives, optical discs, external hard drives, computers (PCs and laptops), local hard disk drives, mobile device or storage media except for short term storage for the purpose of transport or as an IT managed data back-up.
- d) When personal, confidential or sensitive PRRD electronic records are temporarily stored on a mobile device or storage media, it shall be password protected and either encrypted or secured with multifactor authentication (MFA).
- e) Non-work-related records should either be destroyed as soon as possible or, preferably, not stored on PRRD computer systems. Non-work-related records stored on PRRD systems are not private and may be involved in litigation discovery processes.

4.5 Destruction of File Folders and Records

- a) When destroying official (i.e., not transitory) PRRD file folders, the process and details shall be triggered by the PRRD RCRS.
- b) PRRD file folders shall be properly inventoried, tracked, and prepared by the Corporate Services Coordinator before being destroyed and authorized by the Corporate Officer.
- c) The destruction of files shall be witnessed; electronic destruction shall be complete (i.e., true deletion of electronic records or physical destruction of the storage media); and physical destruction shall be performed in a secure manner.
- d) Transitory records may be destroyed without filing, classification, tracking or approval unless a legal hold is in place which prevents such destruction. See Appendix A: Understanding Official and Transitory Records for more information on transitory records.

4.6 Transfer of File Folders

- a) When transferring ownership of PRRD files, the process and details shall be triggered by the RCRS.
- b) The transfer of PRRD file folders shall be properly inventoried, tracked, and prepared by the Corporate Services Coordinator and authorized by the Corporate Officer.
- c) The transfer of PRRD file folders shall be witnessed by the Corporate Officer.

Affiliated Policy	Privacy Management Program Policy
Affiliated Procedure	Basic Storage Standards



Appendix A: Understanding Official and Transitory Records

1. Purpose

- 1.1 It is necessary for all PRRD Board members and employees at all levels to understand what a transitory record is and how it is different from an official record. There are two reasons why this is important. First, official records must be filed into a classified file folder. Second, transitory records must be destroyed regularly to prevent an accumulation of useless, low value and temporary records.
- 1.2 The accumulation of transitory records can be costly and may expose the organization to needless cost, wasted time and space and storage issues. Freedom of Information requests and litigation discovery projects must include any transitory records. In addition, some transitory records may cause unnecessary confusion (e.g., drafts and copies) during decision making processes.
- 1.3 To help staff meet the requirements of the RIM-03 Records Management Policy, this appendix provides examples of transitory records, instruction on how to recognize them and destroy them, as well as exceptions to the rules.
- 1.4 Under the authority of the RIM Policy, transitory records can be legally and routinely destroyed when no longer needed. However, any transitory record that may be involved in a Freedom of Information request or is under a legal hold may not be destroyed except with written approval.

2. What is a Transitory Record?

- 2.1 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.
- 2.2 Transitory records:
 - a) ARE NOT the best source of evidence for a decision, activity or transaction
 - b) DO NOT support the accountability of the organization operations or programs
 - c) ARE NOT required to meet statutory, regulatory or audit requirements
- 2.3 If there is any doubt about whether a record is transitory, treat it as if it were an official record.



3. Categories of Transitory Records

3.1 It is helpful to think of transitory records as belonging to one of six categories: Temporary Notes, Convenience Copies, Non-Relevant Recordings, Drafts, Unsolicited Mail and Reference Material.

- a) **Temporary Notes:** Temporary information that is required to complete a routine action, prepare an ongoing record, or was received for informational purposes only. It has little value and can be destroyed once it has been acted upon and is not required to support the operations and accountability of the program department.
 - i. Examples: Telephone/voicemail messages, data entry forms, to do lists, "FYI" email messages, email that transmits an attachment with no other information, meeting notices, informal notes, and opened envelopes.
 - ii. Exceptions: If a note or message's existence carries extra information related to a business function or activity, it must be kept. If a message provides evidence of an action or decision, it must be kept. Similarly, a postmark on an envelope, the date stamp on a voice mail or the time an email is received may be necessary to prove that the information transmitted was sent or received by a certain time or date. A required and official signature on a data entry form may require the form to be kept even though the data is entered into a database.
 - iii. Method of Physical Destruction: If there is a possibility of confidential or personal information in the record's content, use a secured shred box or shred it manually.
- b) **Convenience Copies (cc).** These are copies of internal documents with no alterations or additions. The office of primary responsibility (OPR) within the organization is responsible for the filing of the official record. Convenience copies are also known as courtesy copies, carbon copies, and non-OPR copies.
 - i. Examples: Internal memos or email notifications, photocopies, or correspondence which has no relevance to the receiving office.
 - ii. Method of Physical Destruction: If there is a possibility of confidential or personal information in the record's content, use a secured shred box or shred it manually.
- c) **Non-Relevant Recordings:** Any audio-visual recordings made during the course of a business activity or function which have little or no information are transitory.
 - i. Examples: Most voice messages are transitory. Photographs and audio-visual recordings taken during incidents, investigations or bylaw enforcement which have no additional relevant information. For example, if a bylaw officer takes thirty photographs of an infraction, they may immediately decide that only six provide relevant information and may delete the remainder.
 - ii. Exceptions: Surveillance recordings are maintained for a set period as defined in the Video Surveillance Policy or the PRRD RCRS. This is due to the fact that an employee is unlikely to review a recording until an incident is realized and therefore cannot make the determination that the recording has no or little relevant information.
 - iii. Method of Physical Destruction: Not Applicable.



- d) **Drafts:** Draft documents and working materials contain information used to create final versions of reports, correspondence, memoranda and other records.
 - i. Examples: Rough notes, research notes, outlines, calculations, preliminary drafts, editing and formatting notes.
 - ii. Exceptions: Some types of records such as legislation, policies, high level plans, agreements and contracts benefit from long term retention of drafts. In these cases, significant drafts which indicate a major decision or a shift in direction need to be retained to provide additional perspective and knowledge about the final record. Also, if no final document is produced, the latest draft is not transitory.
 - iii. Method of Physical Destruction: If there is a possibility of confidential or personal information in the record's content, use a secured shred box or shred it manually.

- e) **Unsolicited Mail:** This category includes unrequested electronic and physical documents.
 - i. Examples: Advertising materials, résumés, brochures, sales letters, catalogues, price lists, company profiles and "spam".
 - ii. Exceptions: Unsolicited materials from a vendor or individual that the organization has a regular relationship with may be filed in a vendor liaison file.
 - iii. Method of Physical Destruction: Recycling.

- f) **Reference Materials:** Any physical or electronic documents gathered or downloaded for information and research. These documents are from external sources but note the exceptions.
 - i. Examples: Publications, books, magazines, newspapers, brochures, journals, newsletters, posters, reports, studies, standards, and software and software documentation.
 - ii. Exceptions: In some cases, a reference document may have been created by another department within the same organization, and it has been placed in a library for convenience. The originating department must classify the official record as explained under Convenience Copies.
If reference documents are retained long term and have some volume, it may be useful to file and classify the records in a reference material secondary in the RCRS.
 - iii. Method of Physical Destruction: Recycling.