

**MANAGEMENT GUIDELINES FOR  
RECORDS MANAGEMENT**

---

COMMITTEE: Senior Leadership Team

PASSED: 25 April 2024

TOPIC: Records Management

AMENDED:

REVIEW PERIOD: As required.

**RECORDS MANAGEMENT PRINCIPLES**

**Accountability**

The Director of Library Services shall oversee the information management program and delegate responsibility for records and information management to appropriate individuals. The NVDPL shall adopt policies and procedures to guide employees, Board Members and volunteers (“Personnel”) and ensure that the program can be audited. All information will have a defined owner(s). It will be their responsibility to manage, protect and to make it available to others.

**Transparency**

The NVDPL’s business processes and activities, including its information management program, shall be documented in an open and verifiable manner, and the documentation shall be available to all Personnel and appropriate interested parties.

**Integrity**

NVDPL’s information management program shall be constructed so the information generated by or managed for the organization has a reasonable and suitable guarantee of authenticity and reliability.

**Protection**

The NVDPL’s information management program shall ensure a reasonable level of protection against unauthorized access to records and information that are private, confidential, privileged, classified, or vital to business continuity, or that otherwise require protection. The protection of information assets shall be carried out in accordance with information security best practices.

Disposal of information of a personal or confidential nature will be carried out securely using the NVDPL’s confidential shredding processes.

Information ownership rights will be observed. Information from third party sources will only be used in accordance with the license or permissions granted. The intellectual property rights of the NVDPL will be considered in relation to the distribution of its information assets.

**Compliance**

The NVDPL will comply with applicable laws and other binding authorities, as well as with the NVDPL Records Management policy and any other applicable internal policies.

## **Availability**

The NVDPL shall maintain records and information in a manner that ensures timely, efficient, and accurate retrieval of needed information. The NVDPL will maintain an inventory of its information assets. Information shall be made available to the public upon request, unless there is a compelling reason not to, recognizing all the relevant legislative and regulatory requirements. This also, applies to internal users of information. The NVDPL will present and organize information to maximize its availability. The storage and organization of information will promote its sharing, thereby minimizing duplication of effort and the cost of its retrieval, as well as contributing to improved decision making.

## **Retention**

The NVDPL shall maintain its records and information for an appropriate time, taking into account its legal, regulatory, fiscal, operational, administrative, and historical requirements. The management and retention of information and records will take into account its value to the NVDPL.

## **Disposition**

The NVDPL shall provide secure and appropriate disposition for records and information that are no longer required to be maintained by applicable legal, regulatory, fiscal, operational, administrative, and historical requirements.

## **Storage**

All information that comes into the NVDPL domain shall be properly recorded in an appropriate container (where applicable). It shall be managed through its lifecycle, which may take it through a variety of different storage environments under the control of different owners. At all times there shall be clear responsibility for its management.

## **Efficiency**

Operational processes shall be designed to eliminate unnecessary duplication or collection of information.

## **Culture**

The NVDPL recognizes that effective information management must be incorporated within the culture, business processes, organization, and infrastructure of the organization.

The NVDPL will:

- Cultivate a suitable business culture where users value, protect, and manage information, including records.
- Develop the professional skills necessary to provide effective leadership and oversight on our information management program.
- Ensure our key information management activities are embedded into our business processes - how we organize, store, secure, protect, share, label, communicate and destroy information.
- Establish appropriate business structure, lines of communication, roles and responsibilities, authority, and suitable delegation of responsibilities to support information management.

## **MANAGEMENT GUIDELINES**

### **Record Creation**

Recorded information is at the centre of all business functions, whether it be required for decision-making, strategic planning, regulatory compliance or future reference. The NVDPL recognizes it has a duty to create, receive and use records as a normal part of conducting business.

## Record Keeping Systems

The NVDPL shall have in place a record keeping system for both physical and electronic records. This system includes the policies, procedures, guidelines, and standards related to the management of records at the NVDPL. The purpose of such a system is to provide efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including the processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records.

The NVDPL will protect and defend information and information systems by ensuring their:

Availability	Reducing risk of loss of service
Integrity	Avoiding unauthorized modification
Confidentiality	Avoiding unauthorized disclosure
Authenticity	Validating the source of information

## Email System Procedures

The NVDPL's electronic mail (email) system as well as ITS recovery storage media of the NVDPL email system shall not constitute a Corporate Records System of the NVDPL and shall not be used for the storage of corporate records.

Where an email message meets the definition of a transitory record as determined by the custodian (creator or receiver) of the email message, it may be deleted together with any associated attachments. Where an email message meets the definition of a corporate record as determined by the custodian (creator or receiver) of the email message, the email message must be retained.

Specific emails shall not be destroyed in the following instances:

- upon receipt of a subpoena (except after written approval of the NVDPL Solicitor);
- or following an FOIPPA request that covers such email records (except after written approval of the FOIPPA Head);
- or when the records are the subject of an internal investigation (except after written approval of the Director of Library Services).

In cases where a specific email message is required for ongoing legal, regulatory, fiscal, audit, administrative, operational, and historical requirements, it shall constitute an official record and must be retained.

## Record Maintenance

The record-keeping system must be maintained so that the records are properly stored and protected and can easily be located and retrieved.

The NVDPL will:

- Ensure that adequate storage accommodation is provided for the records in a dedicated, secure records store.
- Monitor the movement and location of records so that they can be easily retrieved;
- Provide an audit trail of record keeping activities;
- Minimize or eliminate where possible the duplication of electronic and physical records;
- Control access to the information in accordance with the NVDPL's technology security best practices;
- Ensure authenticity so that records retain their legal integrity;
- Identify vital records and apply appropriate protection to them, including a recovery plan that ensures the restoration of the business function; and
- Identify records no longer required for the conduct of current business, and if appropriate transfer to designated storage in accordance with the approved Retention Schedule.

## **Retention**

The NVDPL standard for the Corporate Records Management System and retention schedule will follow closely the standards and best practices outlined in the Local Government Management Association of British Columbia's Records Management Manual for Local Government in British Columbia.

The NVDPL requirements for electronic systems integrity will follow the Canadian General Standards Board's national standard on Electronic Records as Documentary Evidence (CAN/CGSB-7234-2005, Sec. 5.5, Proof of system integrity).

Both of these standards will provide the Courts with guidelines against which the NVDPL's efforts to create, receive, maintain, use and dispose of corporate records, can be measured.

Not all recorded information meets the criteria of a record. These will be referred to as transient records.

## **Disposition**

Deletion refers to the informal act of destroying (physical) or deleting (electronic) documents. Disposition refers to the formal process whereby records are destroyed or transferred in accordance with the approved retention schedule, under the direction of the Director of Library Services.

The NVDPL will apply disposition to all records in accordance with the retention schedule in a manner that ensures:

- Records of business value are identified and retained for an appropriate period;
- An audit trail is maintained of disposition activities;
- Disposition activities of applicable records are suspended in accordance with a Freedom of Information request or other legal proceeding, until such proceedings are completed;
- Transient records will be deleted in a consistent manner according to internal NVDPL guidelines;
- Transient records will be destroyed so that reconstruction or recovery is unlikely; and
- Physical and electronic records destroyed in accordance with the retention schedule will be destroyed such that the records cannot be recovered in any way.

The NVDPL will apply deletion to all transient records in accordance with the following:

- The NVDPL will establish appropriate retention periods suitable for the business use of these documents.
- Automatic (machine-initiated) deletion (based on pre-determined retention periods) of electronic documents shall be acceptable for the destruction of transient records.

## **Protection**

All NVDPL Personnel are required to share information responsibly and sensibly, and information that has been recorded on NVDPL systems should be available to those people within the department who have a legitimate business need. However, this does not necessarily mean universal access. Information that is (or should be) protectively marked will be limited to those who genuinely need access to it. Sensitive or personal information on individuals must also be marked, and access strictly limited to those who need it to carry out their duties.

Access will be controlled by the use of protective markings, descriptors, and passwords. Where access must be limited, the information must be protected and labelled properly. It must also be stored in an appropriately secure storage container or system.

Information is often shared between the NVDPL and other agencies, and third-party service providers. The NVDPL will avoid inappropriate release of information (whether through reasons of security, privacy, commercials or copyright) to any party outside of NVDPL.

The NVDPL will:

- Maintain and publish clear and concise information security and access policies
- Maintain and publish a list of protective markings and descriptors for documents
- Provide appropriate information infrastructures, capable of supporting security and access requirements
- Require staff to label information with the appropriate protective markings and descriptors
- Undertake periodic reviews of accessibility, security and privacy of information held within each department
- Investigate shortfalls of accessibility, or breaches in security or privacy, to reduce risk of repetition
- Monitor compliance with information access requests
- Assess and manage risks to the confidentiality, integrity and availability of information at all stages of the information lifecycle
- Balance the need to protect information with the need to effectively make use of it
- Develop a risk-aware culture
- Take appropriate measures to protect information from inadvertent or unauthorised creation, access, alteration, transmission or destruction
- Comply with all legislative and other mandatory requirements relating to the protection or destruction of information
- Ensure that all staff are aware of their responsibilities regarding information, its management and use

### **Electronic Document & Recordkeeping Management System (EDRMS)**

The NVDPL will deploy, support and maintain the appropriate hardware, software and network for capturing, storing, communicating and retrieving information in accordance with the Records Management policy.

The NVDPL will implement and maintain an EDRMS for the administration and management of electronic documents and records. This system allows the NVDPL to, as a minimum:

- Provide a means whereby all Personnel can declare electronic and physical records within the EDRMS, by configuring and customizing the EDRMS software as required
- Provide a suitable means to ensure all records have appropriate security permission providing for appropriate access for all employees, while restricting access to those who should not have access
- Provide a means of recording and maintaining the NVDPL's retention schedule/file plan
- Provide for the identification of document lifecycle state and status
- Provide a means of managing physical records as well as electronic records
- Allow for each document to be classified against the retention schedule, whether accomplished manually by the user or automatically by the system
- Provide a means of applying a legal hold to designated records
- Identify and manage Vital records in an appropriate manner
- Provide a means of applying the NVDPL's approved retention schedule to all records
- Provide a means of recording, tracking, and deleting non-records
- Manage the lifecycle of all records, from creation through to final disposition
- Identify records containing Personal Information (PI)
- Identify records containing sensitive information
- Reduce or eliminate various means of electronic document storage that act as an alternative to the NVDPL's designated electronic records management system

Information in structured data stores, such as spreadsheets and transactional databases, shall be managed as recorded information like other records. Key outputs, or the contents of the data store at certain times, shall be treated as a record, and retained in accordance with the retention schedule.

## Personal Information

The NVDPL has to collect and use information about people with whom it works. These may include members of the public, current, past and prospective employees, clients and customers, and suppliers. This personal information must be handled and dealt with properly, however it is collected, recorded, and used, and whether it be on paper, in computer records or recorded by any other means.

The NVDPL regards the lawful and correct treatment of personal information as very important to successful operations and to maintaining public confidence in the NVDPL. The NVDPL will treat personal information lawfully and correctly. To this end, the NVDPL fully endorses and adheres to the *Freedom of Information and Protection of Privacy Act* (FOIPPA).

NVDPL will:

- Observe fully the obligations of the NVDPL specified by the FOIPPA Act regarding the collection and use of information
- Maintain a listing of personal information banks
- Make every reasonable effort to assist FOIPPA applicants in their efforts to access records.
- Where access to personal information is granted in accordance with a request under FOIPPA, the NVDPL will provide a copy of the record if requested, if the copy can reasonably be reproduced.
- Meet its legal obligations to specify the purpose for which information is used
- Collect and process appropriate information and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements
- Apply checks to determine the length of time personal information is held
- Ensure that any third-party processors contracted by the NVDPL adhere to appropriate controls through Information Sharing Agreements
- Where a contractor provides services to the NVDPL, the NVDPL will clearly indicate through provisions in the contract the records over which the NVDPL has control.
- Ensure personal information shall be adequate, relevant and not excessive in relation to the purpose for which they are processed
- Ensure personal information is accurate and where necessary, kept up to date
- Not process personal information for any purpose longer than is necessary for that purpose
- Ensure appropriate technical and organizational measures are taken against unauthorised or unlawful processing of personal information and against accidental loss or destruction of, or damage to personal information
- Not transfer personal information to a country or territory outside Canada unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information
- Ensure that the rights of people about whom information is held can be fully exercised under FOIPPA. These include:
  - the right to be informed that collection is being undertaken
  - the right of access to one's personal information
  - the right to prevent collection in certain circumstances
  - the right to correct, rectify, block or delete information that is regarded as wrong information

## ROLES AND RESPONSIBILITIES

### Director of Library Services (DLS)

The DLS must ensure the establishment of an effective information management program function within the NVDPL. The DLS provides leadership, direction, and vision for the NVDPL's overall Information Management program, including an enterprise-wide framework for the governance of records and

information management, develops policies, procedures and guidelines, standards and practices in support of NVDPL's corporate recorded information holdings.

It is the responsibility of the DLS to:

- Implement this policy in a cohesive manner across all of NVDPL
- Establish the corporate vision, values and strategies that address information as a strategic business asset of the NVDPL
- Designate staff to oversee the information management program and systems
- Ensure all employees are aware of their obligation to manage information appropriately
- Ensure all data protection and security of information policies and procedures are understood, implemented and adhered to
- Establish and maintain a Corporate Records Management Program.
- Oversee the creation of policies, standards and guidelines related to recorded information management
- Oversee the destruction and transfer of records in accordance with the approved retention schedule
- Initiate internal management reviews of the implementation and compliance with the Records Management policy and related management practices and controls
- Eliminate significant deficiencies, and make improvements to the information management program, and report significant findings to the Library Board

### **DNV Director, Digital and Information Technology & IT Manager**

The DNV Director, Digital and Information Technology and the NVDPL IT Manager provides IT systems and services in support of information management. It is the responsibility of these parties to:

- Provide technical advice on the management of corporate records in electronic format and determine which applications shall make up the Corporate Electronic Records Systems of NVDPL (SharePoint and Business and Enterprise applications)
- Establish guidelines on disaster planning and recovery for corporate records in electronic form
- Ensure the systems used to communicate and store recorded information are as reliable and efficient as practicable
- Implement deletion capabilities for all electronic documents other than declared records, in accordance with NVDPL's policies for deletion of such documents. Such capabilities should extend to all storage media upon which such documents may be found, including but not limited to shared drives, local hard drives, portable media, social media, remotely located storage such as cloud-based storage, backup media, etc
- Consult with the Director of Library Services prior to the selection, construction, or acquisition of any system that records electronic information.

### **Managers of Departments**

It is the responsibility of department managers to:

- Ensure that the practices established in this document are funded and carried out as a matter of routine within their business units and departments
- Ensure that the records in the department's custody are not disposed of unless authorized by the retention schedule approved under this policy

### **NVDPL Personnel**

All Personnel and those acting on behalf of NVDPL are responsible for ensuring the proper classification, transmission, maintenance, storage, and protection of recorded information. Working individually or collectively, Personnel must ensure information is properly managed as a corporate asset.

It is the responsibility of all Personnel to:

- Assure the quality, authenticity, and reliability of information they create
- Take good care of recorded information NVDPL has entrusted to them
- Account for other people's need for recorded information that they create or control, and share the information appropriately as required by the business
- Comply with the Records Management policy
- Understand the duties the *Freedom of Information and Protection of Privacy Act* places on NVDPL as a public authority
- Assess the importance, urgency and sensitivity of information
- Ensure that information that needs to be kept confidential (for security or privacy reasons) is not inappropriately divulged
- Work cooperatively to correct errors in information management and reduce risk of recurrence
- Comply with Policy B-OP-12: Acceptable Use of Information and Communication Technology
- Keep accurate and complete records
- Follow the specific requirements of his/her department when making decisions about whether to classify information as a record, a work-in-progress (WIP), or a reference document
- Distinguish records from non-records
- Identify and classify all records according to the records retention schedule
- Abide by all legal hold directives preventing information deletion as a result of current or anticipated litigation, government investigation or audit
- Ensure any records in his/her custody or control are not removed from NVDPL premises unless such removal is required to conduct NVDPL business and unless any confidential or personal information contained therein is safeguarded in an appropriate fashion
- Return information promptly when the purpose for which the information was removed from NVDPL premises has ended
- Return all records to NVDPL upon termination of his/her employment or contractual relationship with NVDPL
- Ensure that all corporate records other than transitory records in their custody or control are not disposed of unless authorized under the retention schedule
- Be responsible for compliance with this policy and report suspected violations of this policy to the appropriate party

### **Review and Monitoring**

This document establishes a performance-monitoring framework to evaluate the effectiveness and efficiency of Information Management activities at NVDPL. NVDPL will monitor and review it on an annual basis, or more frequently if deemed necessary by the Director of Library Services, to ensure:

- The scope and content of this document is still appropriate and in line with legal requirements
- All departments are aware of their responsibilities and that the creation, maintenance and disposal of information is carried out in line with the policy and supporting standards
- Training and awareness is provided in accordance with the policy
- Requests for personal information, and for information without personal content, are responded to within the statutory timescales under the FOIPPA

### **DEFINITIONS**

#### **Active Document**

A record created and received in a business environment during the time it is needed to conduct and support current business actions.



## **Corporate record**

Corporate records must have fiscal, legal, administrative, evidential and/or informational value to be maintained and preserved as evidence of functions, policies, decisions, procedures, and operations to be considered a corporate record. In other words, corporate records are necessary for the continuing conduct of library business.

## **Document**

Indivisible unit of recorded information having stable content and fixed form.

## **Duplicate Record**

Duplicate records are reproductions of official records that have already been placed on file.

Duplicate correspondence received from an external organization or individual copied to NVDPL should be placed on the appropriate file. In addition, duplicate records that contain significant annotations should be kept as an official record.

Information copies of correspondence, duplicates of internal publications, duplicates of external documents and publications may be destroyed.

## **Information**

Information is facts about something or someone.

## **Non-records**

Records created that have no business value such as transient records.

## **Official Record**

Official records are anything containing information which is made, produced, executed, or received in connection with the legal obligations, transactions, or business activities of the North Vancouver District Public Library.

This includes, but is not limited to forms, documents, papers, correspondence, note books, reports, contracts, letters, memoranda, accounts, receipts, books, maps, plans, and photographs; analogue and digital motion picture and audio recordings, paper tapes, punch cards, microfilm, microfiche or any other micrographic rendering; electronic mail (email), word processing documents, spreadsheets, and any other electronic documents; electronic data input to, output from, captured by, or used as source code or data content for any data processing devices, databases, or applications; and any other information acquired, created, or held by the NVDPL.

## **Personal Information**

Personal information is any recorded information that uniquely identifies an individual, such as name, address, telephone number, age, gender, race, religion, sexual orientation, disability, fingerprint or blood type. It includes information about an individual's health care, educational, financial, criminal and employment history. It also includes anyone's opinions about that individual and that individual's own views and opinions. Personal information also includes seemingly innocuous separate items of information that, when put together, would allow someone to accurately infer information about an individual.

## **Record(s)**

Information created, received or maintained as evidence and as an asset by an organization or person, in pursuance of legal obligations or in the transaction of business.

## **Records Management**

Field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records.

### **Records Retention Period**

Specified period of time that records are kept to meet operational, legal, regulatory, fiscal or other requirements.

### **Records Retention Schedule**

Provides a timetable and consistent procedures for maintaining the organizations records, moving the records to inactive storage when appropriate and destroying records when they are no longer valuable to the organization.

### **Semi-Active Documents**

Records previously created and received in a business environment that might be called upon to support business actions or decisions.

### **Transitory Record**

Transitory records are documents required for a limited time only to complete routine tasks having no long-term value to the NVDPL. Like official records, transitory records may exist in any format. But unlike official records, transitory records are not created (made or received) for the purpose of becoming a permanent record of the NVDPL.

Some examples of transitory records may consist of fax covering pages, duplicate documents or convenience copies, blank or superseded forms, advertising material, meeting invitations and arrangements, working materials and drafts including rough notes and related materials used for the preparation of correspondence, reports, memoranda or other records once the finished official corporate record has been produced. Such information is distributed for short-term informational purposes only. These records are not required (nor intended) to become part of a corporate file and may be destroyed once they are no longer needed.

### **Vital Record**

A corporate record essential to the resumption and/or continuation of an organization's activities; the re-creation of the legal and financial status of the organization; and the fulfillment of obligations to employees, outside interests and/or stakeholders.

For example, Board minutes, policies, agreements, charters, contracts, payroll records, and accounts receivable are all vital records series. Note that vital records are not necessarily archival.