

# Information Management Policy

Policy Number

Effective Date August 24, 2018

Status FINAL

Final Approver CMT

## Purpose

1. Information management encompasses the business processes, disciplines and practices of the City used to manage records/information holdings created from the City's data, irrespective of format and/or media, from initial design, creation, use, storage, sharing, protection, through to archival or disposal, in accordance with the City's legal obligations.
2. Effective information management improves information flows, speeds communications, improves business outcomes and builds trust. It reduces the costs of doing business with the City, drives competitive advantage and enables fact-based analysis and decisions to be made with confidence.
3. Information management is essential for open government, facilitating accountability, transparency and collaboration; preserving and ensuring access to recorded information ("Records") in support of the City's legal obligations and benefitting present and future generations.
4. This policy:
  - a. sets out expected information management practices;
  - b. identifies roles and responsibilities for information management; and
  - c. demonstrates the City's commitment to meeting business, legislative and regulatory requirements with respect to its information holdings.

## Persons Affected

1. This policy applies to:
  - a. all employees, including volunteers and students;
  - b. the City Clerk;
  - c. the Chief Information Officer (CIO);
  - d. the Director of Legal Services;
  - e. the Corporate Records and Information Officer;

- f. the CMT; and
- g. Supervisors/Managers/Directors.

## Policy Statement

1. It is the policy of the City to ensure that:
  - a. City information, irrespective of format or media, is managed strategically as a corporate asset to reduce cost, support decision making, add value to existing products and services, and create value through new information-based products and services;
  - b. City information shall be:
    - i. managed effectively and efficiently to support program and service delivery and help the organization achieve its strategic and operational business goals;
    - ii. used for comprehensive and balanced data-driven decisions;
    - iii. designed for openness, while protecting privacy and confidentiality;
    - iv. managed in order to be current, accurate, relevant and easy to use; and
    - v. managed in order to be affordable and available to the public wherever possible.
  - c. City information shall be managed electronically as the standard, have a single authoritative source, and be interoperable to enable the exchange and use of information on City systems, whenever it is legal, practical and cost-effective to do so;
  - d. the City shall implement fit-for-purpose information management practices and systems to ensure information is managed through its lifecycle (plan/design, create, storage/retrieve, share, protect/recover, archive/transfer and delete/destroy);
  - e. City information assets shall be protected and secure from unauthorized access and modification;
  - f. City information shall provide evidence of significant business decisions, activities and transactions, including information which serves to reconstruct the evolution of policy and program decisions;
  - g. City information will be retained in accordance with the City's Records Retention Schedule;

- h. City information with historical or archival significance will be identified as such;
- i. the City's information management practices shall address right of access and privacy protection obligations under the Municipal Act and the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), and other applicable law;
- j. City information shall be managed in accordance with the key principles of the information management framework; and
- k. the City shall conduct regular reviews of its information management policies and procedures to reflect best practices as legislation changes and technology advances.

## **Responsibilities**

The City Clerk and Chief Information Officer (CIO) shall jointly lead the development, coordination, resourcing, execution and monitoring of the corporate information management strategy/framework and related plans to ensure information is being managed effectively and efficiently through its lifecycle. Specific responsibilities are outlined in the policy statements below.

1. CMT members are collectively and individually responsible for approving and directing compliance with this policy.
2. The Chief Information Officer shall:
  - a. establish and direct an information and data management program to foster and support an information-centric culture required to deliver innovative services to customers and insights to leadership, which includes:
    - i. ensuring business needs are incorporated into effective information management standards of practice;
    - ii. developing and communicating information and data architectures, and advise information and data focused project teams on how to comply with those architectures;
    - iii. developing and promoting effective information management standards of practice in the delivery of services to customers, including accountability, transparency and collaboration;
    - iv. balancing the need for corporate standards of practice with unique departmental or line of business needs;

- v. ensuring tools and processes are in place for business to prioritize, monitor and report on the condition and quality of corporate information and recommend corrective action where necessary;
- vi. coordinating with the corporate Records management program; and
- vii. ensuring information systems have acceptable security and privacy protection controls and that these controls are successfully implemented and tested.

3. The City Clerk Shall:

- a. serve as the Head of the City with respect to MFIPPA as delegated by the Mayor in accordance with bylaw 98-2, A By-Law to Designate a the Head of the Municipal Corporation for the Purposes of the Municipal Freedom of Information and Protection of Privacy Act, 1989;
- b. as the custodian of the City's Records, establish and direct the City's corporate Records management program which is charged with ensuring the City maintains its retention, access and protection of privacy obligations under the Municipal Act and MFIPPA for both electronic and paper records, which includes:
  - i. developing and promoting procedures, standards and guidelines with respect to the management of Records as well as approval of departmental file plans;
  - ii. designating and establishing classes of records for the purpose of retention, destruction or permanent preservation of the records of the Municipality;
  - iii. responding to requests made pursuant to MFIPPA;
  - iv. coordinating with the City's information and data management program;
  - v. applying effective information management standards of practice in the delivery of services to customers and recommend and implement policies with respect to Records management, MFIPPA and privacy;
  - vi. identifying tools, facilities and resources necessary for service delivery; and
  - vii. ensuring the existence and currency of supporting bylaws.

4. Jointly, the City Clerk and CIO shall:

- a. ensure information and data management practices and systems of the corporation consider and support the requirements of law, including but

not limited to legislation and regulations governing privacy, security, records retention and evidence. Examples include Municipal Act, MFIPPA, Payment card industry regulations (PCI), Canadian Anti-Spam Law (CASL);

- b. establish information governance to ensure information:
    - i. contributes strategically to the organization's goals, enables efficient access to and makes effective use of the information needed for employees to do their work and to develop themselves; and
    - ii. improves the quality and timeliness of decision-making, while ensuring it is secure and accessible.
  - c. establish Official Records Systems and certify Official Electronic Records Systems (e.g. HRMS, FMS, CLASS, DASH and HP TRIM) which shall electronically store Official Business Records;
  - d. ensure the City's information, data and Records management programs are aligned with each other and the needs of the corporation; and
  - e. establish support awareness and training programs as required.
5. The Corporate Records and Information Officer shall:
- a. assist the City Clerk in the responding to requests pursuant to MFIPPA;
  - b. manage and coordinate the City wide corporate Records management program, which includes:
    - i. recommending procedures, standards and guidelines with respect to the management of Records;
    - ii. identifying tools, facilities and resources necessary for service delivery; and
    - iii. ensuring the existence and currency of supporting bylaws.
6. The Director of Legal Services shall:
- a. ensure that the City's information management policies, practices, and plans meet legal requirements; and
  - b. provide legal advice and opinion with respect to Records management, MFIPPA and privacy.
7. Supervisors/managers/directors shall:
- a. ensure staff under their supervision are adequately trained on proper information management practices and follow the provisions of this policy and related procedures in their day-to-day work;

- b. understand, follow and promote the key principles and guidelines of effective and efficient information management as outlined in the corporate information management framework;
  - c. assist efforts to review and analyze records and information management practices within their business units;
  - d. designate staff to serve as Record Custodians who will be accountable for ensuring information in their department is accurately classified and handled according to the requirements of the Records Management Program; and
  - e. alert the Clerk and/or CIO of material breaches of this policy.
8. Employees shall:
- a. apply proper information management practices and follow the provisions of this policy and related procedures in their day-to-day work;
  - b. keep City information protected and secure from unauthorized access and modification;
  - c. report theft, loss or unauthorized disclosure of confidential or proprietary information to his/her supervisor immediately; and
  - d. create and maintain records that adequately document and provide evidence of the City business transactions and activities in which they take part in the performance of their duties, as well as those activities carried out on the City's behalf by contractors or other authorized agents for which they are responsible.

## Approval Authority

Role	Position	Date Approved
Subject Matter Expert	Corporate Records & Information Officer Technology Solutions Architect	
Legal Review	Senior Legal Counsel	
Management Review	Directors	
Final Approval	CMT	August 24, 2018