

**POLICY No. 2025-XX Records and Information Management**

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**Policy Type: Records Management**

**Subsection:**

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**Policy Title: Records and Information Management Policy**

**Policy Number:**

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**Policy Approved By:**

**Effective Date:**

**Reviewed:**

**Revised:**

**Applicable To:**

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## **Records and Information Management Policy Statement**

The County of Northumberland (the County) is committed to the effective management, preservation, and protection of its records and information throughout its lifecycle. This policy ensures that all records, regardless of format, are created, maintained, and disposed of in accordance with legal, regulatory, and organizational requirements.

The County recognizes that records and information are valuable corporate assets that support transparency, accountability, operational efficiency, effective customer service, business continuity, litigation support, and informed decision-making. The County is dedicated to ensuring that these assets are managed in a way that protects privacy, ensures compliance, and maximizes organizational effectiveness.

## **Definitions**

See Appendix A.

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### **Objective(s)**

The objectives of this policy are to:

- Ensure the application of consistent standards and practices for the lifecycle of records and information in the custody and control of the County, including the structuring and classification of data in formats that support advanced technologies such as artificial intelligence (AI), and
- Facilitate proper records management practices that align with the County's legal, regulatory, and operational needs, while laying the groundwork for responsible, ethical, and efficient use of AI in County operations.

### **Authority**

[Municipal Act, 2001, S.O. 2001, c. 25](#)

[Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. M.56](#)

[Personal Health Information Protection Act, 2004, S.O. 2004, c. 3, Sched. A](#)

### **Scope**

This policy applies to any person that is provided with access to records and information in the custody or control of the County, including County employees, elected officials, contractors, and volunteers. It covers all corporate information managed by the County, regardless of format (e.g. paper, electronic, audio, or visual).

### **Procedures**

Accurate, useable, and accessible information supports open, transparent, and accountable governance, effective customer service, and program delivery.

### **Principles**

The following principles and practices are the framework for effectively managing the information assets of the County:

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### **Accountability and Transparency**

- Responsibility for managing records and information in the custody and control of the County is clearly defined, communicated, and monitored
- Information not containing confidential or personal information is available to the public in accordance with the provisions of the *Municipal Freedom of Information and Privacy Act (MFIPPA)* and the *Personal Health Information Protection Act (PHIPA)*
- Access to and disclosure of corporate information is administered in accordance with MFIPPA and PHIPA
- Employees should have timely access to the information needed to perform their roles efficiently
- In accordance with MFIPPA, it is an offence to willfully alter, conceal, or destroy/delete a record or cause any person to do so, with the intention of denying access to a record or information contained in a record

### **Quality and Integrity**

- Information quality is assured at the time of collection or creation
- Records are created within a reasonable time of the transaction or events they document to the greatest extent possible
- Official and/or final versions or records or data are known and accessible
- Transitory records which do not need to be retained according to the Records Retention By-law are destroyed on a routine basis
- The integrity, authenticity, reliability, and useability of information is preserved throughout its lifecycle
- All records are managed in a way that allows them to be audited for compliance, accountability, and transparency
- Information is captured with appropriate metadata to support discoverability, interoperability, and automated processing, which are critical for effective AI integration

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- Data normalization and standardization practices are implemented to ensure information is usable by AI systems, reducing bias and improving data reliability

### **Access and Security**

- Information must be stored in the appropriate corporate shared repository to ensure it can be accessed when needed
- Unless a record contains personal or confidential information, it should be available to other County employees
- The County establishes and maintains procedures and other controls to ensure the security of its information, including prevention of unauthorized access to its systems, third party access, and remote access
- Security incidents are to be reported to IT in accordance with IT policies
- The County will establish and maintain a security classification protocol, used to classify all of its information, that will guide practices related to labeling, storing, sending, and sharing information, information disposal, the protection of information integrity, and the appropriate use and disclosure of information
- As AI systems may automate access and decision-making processes, governance protocols must ensure appropriate access rights and auditability of algorithmic interactions with records and information
- AI-driven access tools will be subject to privacy, confidentiality, and security controls consistent with MFIPPA, PHIPA, and the County's IT policies

### **Retention and Disposal**

- Records should only be retained for as long as required for legal, regulatory, business, or operational purposes
- Records containing confidential or sensitive information will be disposed of securely
- Records will be disposed of in compliance with the records retention schedule
- AI tools used to generate records (e.g. automated reports, chatbots) will be governed by the same retention and integrity rules as human-created records

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### **Efficiency and Effectiveness**

- The County will implement records management systems and practices that optimize resource use, minimize duplication of efforts, and streamline workflows while maintaining compliance with all regulatory requirements
- Information management practices will be continually evaluated to ensure that they are supporting the County's needs in an effective and efficient manner
- Where appropriate, AI tools may be integrated to support classification, retrieval, and analysis of records. These tools will be evaluated for accuracy, transparency, and compliance with privacy and ethical standards

### **Sustainability**

- The County will promote environmentally sustainable practices, such as reducing paper usage and supporting the digitization of records where feasible
- For long-term retention, digital records will be preserved in formats that can be accessed over time, adhering to digital preservation best practices

### **Collaboration and Sharing**

- Effective records management is supported through cross-departmental collaboration. Information sharing and cooperation will be encouraged to ensure that records are accurate, accessible, and timely
- The County will ensure that its information management systems are interoperable with other government agencies or partners where appropriate, enhancing access and sharing of information in compliance with legal requirements

### **Planning**

- Planning for records and information management is linked to organizational goals and objectives
- The management of records and information is integrated with program planning and other business processes

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### **Lifecycle Management**

- Information will be managed from the time of creation or receipt through use, maintenance/storage, and disposition (destruction or preservation) in accordance with the records retention by-law
- The retention and disposition of County records is governed by the most current records retention by-law
- The records retention by-law is reviewed annually and updated to reflect legal requirements and business needs
- The County records classification scheme, which classifies all official County records, is based on the Ontario Municipal Records Management System (TOMRMS)
- The Information Management Coordinator must approve the disposition of all official records
- The County establishes and maintains procedures to identify and ensure the permanent preservation of information assets of archival value

### **Compliance**

- The County complies with the records and information management requirements of laws, regulations, and standards related to its operations and adheres to generally accepted records and information management standards and best practices
- The County establishes and maintains internal procedures, guidelines, standards and best practices
- The County promotes compliance with this policy and associated procedures, guidelines, standards, and best practices through employee training and education
- The County's use of AI tools for managing or interpreting records must comply with all applicable legislation, and ensure transparency, fairness, and accountability in automated processes
- AI applications used to process or generate records must preserve record integrity and ensure the traceability of sources

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### **Continuous Improvement**

- Records management practices will be adaptable and flexible, accommodating technological advancements, changes in legal requirements, and shifts in organizational needs
- The County will implement processes for ongoing evaluation and refinement of its records management systems to improve efficiency and compliance
- The RIM program will monitor advancements in AI and machine learning to assess and incorporate innovations that improve information governance, workflow automation, and decision-making
- The County will develop internal capacity and guidelines for the responsible use of AI tools in records management, including risk assessments and pilot testing

### **AI-Readiness and Ethical Use**

- The County recognizes that responsible data stewardship is foundational to the ethical and effective use of AI. Records and information management practices will prioritize:
  - High-quality, well-structured, and consistently classified data, enabling AI tools to function accurately and efficiently
  - Metadata standards and data tagging, ensuring that AI systems can interpret and use information responsibly
  - Transparency and accountability in all AI-enabled processes affecting information creation, retrieval, or disposition
  - Bias mitigation strategies in AI tools, including regular reviews of training data sets and outcomes
  - Clear audit trails for AI-driven actions on records, ensuring traceability and compliance with legal requirements
  - Cross-departmental collaboration to identify and prepare datasets suitable for AI applications

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### **Responsibilities**

The CAO, Directors, and County Clerk will:

- Provide corporate leadership and support with respect to the records and information management policy and related initiatives

The Information Management Coordinator (IT) will:

- Coordinate the corporate records and information management program
- Recommend and implement policies and create and maintain associated procedures, standards, guidelines, and best practices
- Provide direction, training, and advice with respect to records and information management
- Provide storage and retrieval services for inactive physical records
- Review and update the records retention schedule and records classification scheme as required

Information Technology leadership will:

- Implement and integrate records and information management policies, procedures, and standards in enterprise architecture, systems, and technologies, where appropriate
- Ensure the security and integrity of electronic records systems
- Ensure records and information management considerations are built into new technological systems or applications prior to implementation, where appropriate

Directors, Managers and Supervisors will:

- Integrate the appropriate management of information assets into the development, implementation, evaluation, and reporting activities of programs and services
- Recommend retention schedule changes related to records in their department's custody and control as necessary

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- Complete departmental approvals for records eligible for disposition
- Ensure staff are fully trained and carrying out their records management obligations

All employees shall:

- Ensure that records they create or receive in support of a County function or to conduct County business are maintained and preserved in accordance with this policy, the records retention by-law, and associated policies and procedures

### **Review**

This policy will be reviewed annually and updated as required.

### **References**

- County of Northumberland Records Retention By-law
- Municipal Act, S.O. 2001, c. 25, Section 254, as amended
- Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. M56 as amended
- Personal Health Information Protection Act (PHIPA), 2004, S.O 2004, c.3, Sched. A, as amended
- Freedom of Information and Protection of Privacy Act Policy (Corporate 2016-02)
- County IT and Archives policies

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### Acknowledgement and Agreement

I, \_\_\_\_\_, acknowledge that I have read and understand the **XX Policy** of County of Northumberland. Further, I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy. I understand that if I violate the rules or procedures outlined in this policy, I may face disciplinary action up to and including termination of employment.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Witness: \_\_\_\_\_

Date of new or revised policy:

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### **Appendix A: Program Definitions**

The following definitions will apply throughout all records and information management policies and procedures:

**Active Record** means a record that is referred to and used on a regular basis

**Archival Record** means a record of enduring significance that has historical value for the County and individuals engaging in historical research

**Authenticity** means the extent to which a business record can be proven to be what it purports to be

**Control (of a record)** means the power or authority to make a decision about the creation, use, disposal, or disclosure of the record

**Copy** means a record that is a duplicate of an original

**County** means the Corporation of the County of Northumberland

**Custody (of a record)** means the keeping, care, watch, preservation, or security of the record for a legitimate business purpose

**Data** means any symbols or characters that represent raw facts or figures and form the basis of information

**Destruction** means the process of eliminating data in a manner that makes the information permanently unrecoverable or unreadable

**Dispose** means to destroy a record or remove it from the official recordkeeping system

**Disposition** means the final stage of records management in which a record is destroyed, transferred, or retained permanently, in accordance with the records retention by-law

**Integrity** means the extent to which a record is demonstrably complete and unaltered

**Lifecycle** means the life span of a record, from creation or receipt to preservation or disposal

**Official Record** means a record in the County's custody or control, regardless of format, that supports County business, such as program delivery or policy development, documents decision making, or has financial, administrative, operational, legal, or archival value

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**Orphan Data** means data that:

- is not machine readable by any of the County's computer systems, or
- is machine readable but does not have sufficient content, context, or structure to render it understandable

**Permanent** means a record that is preserved and/or never destroyed or removed from the official recordkeeping system

**Personal Health Information** means identifying information about an individual in oral or recorded form, if the information:

- relates to the physical or mental health of the individual, including information that consists of the health history of the individual's family,
- relates to the providing of health care to the individual, including the identification of a person as a provider of health care to the individual,
- is a plan that sets out the home and community care services for the individual to be provided by a health service provider or Ontario Health Team pursuant to funding under section 21 of the *Connecting Care Act, 2019*,
- relates to payments or eligibility for health care, or eligibility for coverage for health care, in respect of the individual,
- relates to the donation by the individual of any body part or bodily substance of the individual or is derived from the testing or examination of any such body part or bodily substance,
- is the individual's health number, or
- identifies an individual's substitute decision-maker.

**Personal Information** means recorded information about an identifiable individual including:

- information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual,
- information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,
- any identifying number, symbol or other particular assigned to the individual,

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- the address, telephone number, fingerprints or blood type of the individual,
- the personal opinions or views of the individual except if they relate to another individual,
- correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence,
- the views or opinions of another individual about the individual, and
- the individual's name if it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual

**Record** means any unit of information however recorded, whether in printed form, on film, by electronic means, or otherwise, and includes correspondence, memoranda, plans, maps, drawings, graphic works, photographs, film, microfilm, sound recordings, videotapes, machine readable records, and any other documentary material, regardless of physical form or characteristics, made or received in the course of the conduct of County business

**Records and Information Management (RIM)** means the systematic management of records and information throughout its lifecycle, from creation and capture through to classification, storage, retrieval, and disposition.

**Records Series** means a group of records that relate to a particular function or operation, that are filed together, and need to be retained for the same period of time

**Reliability** means the extent to which the contents of a record can be trusted [proven?] to be complete and accurate

**Repository** means an electronic or physical filing location where records are maintained in accordance with the Records Retention By-law

**Retention Period** means the period of time during which a specific records series must be kept before records in that records series may be disposed of

**Retention Schedule** means a schedule/timetable that identifies the County's records and the length of time the records must be retained before their final disposition

**TOMRMS** means the Ontario Records Management System, which is used as the basis for the County's file classification system

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**Transitory Record** means a record with temporary usefulness and no long-term value

**Vital Record** means a record that is essential to the continuation or resumption of County business in the event of a disaster. A vital record allows the County to continue to fulfill its obligations to taxpayers, employees, other levels of government, and outside interested parties