



## Records and Information Management Policy

### INTRODUCTION

This Records and Information Management (RIM) Policy is the governance document defining the rules for managing the City of San Dimas' (the "City") records and information. This RIM Policy communicates what rules the City will follow in managing its records and information in compliance with laws, regulations, and good business practices. The rules within this Policy apply to the content of the information, not the tools used to create it or media on which it resides.

Below is the list of rules the City will follow.

### RECORDS AND INFORMATION MANAGEMENT POLICY

#### A. Ownership

Records and information created or received in the conduct of the City's business by staff, by contractors acting on behalf of the City, or by elected and appointed officials are the exclusive property of the City. City records and information are subject to compliance with this Policy, the associated Records Retention Schedule, and any other City policies or procedures.

#### B. Authenticity

The City is committed to creating and maintaining complete, accurate, and trustworthy records and information that document its business activities. Deliberately creating false or misleading records or information regarding the City's activities is strictly prohibited.

#### C. Retention

Records are to be retained in accordance with the adopted Records Retention Schedule. When records complete their retention period, regardless of their format, they shall be deleted or disposed of in compliance with City procedures.

#### D. Storage

Hardcopy records and information no longer considered active may be transferred to designated storage facilities or to an archive media to fulfill retention requirements. Electronic records no longer considered active and that have not met their retention requirements may be transferred to approved repositories or moved offline to fulfill retention requirements. Regardless of where records are stored, they must be accessible by City employees for business purposes and in response to requests from the public.



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Records and information owned by the City should not be transferred to or stored in any unauthorized locations or on personal devices. Work done on a personal device on behalf of the City is the property of the City and should be transferred to a City repository.

### E. Availability

Records and information must be available for future business and to support litigation and investigations, as necessary, regardless of storage location.

Records that are determined to be “public” are to be made available for the public to obtain in accordance with the California Public Records Act, Government Codes §§7920.000 through 7931.000.

### F. Electronic Communication

Unless otherwise required by contract or law, including data privacy laws, electronic communication, including emails, email threads, text messaging, instant messaging, chatter, information posted to social media and any other form of electronic communication that may be used to conduct City business, are subject to this Policy and other rules of the City, and are the exclusive property of the City.

Email messaging is required to be conducted using City systems. Emails sent or received for the purpose of City governance or business are considered City property and must be maintained in City systems and, if they are determined to be a record, in compliance with the Records Retention Schedule.

Instant messaging such as text messages are to be limited to brief communications to establish contact, identify location or confirm appointments. Text messages should not be used to create and communicate directives, conduct City business, or send files. Instant messages are not considered records for retention purposes.

Electronic Communication systems are intended to be a system for transmitting communication and not as a repository for City records. Although Electronic Communication may seem to be less formal than other written communication, the same definition of Records applies, as do the rules for storage and retention. Electronic Communication that meets the definition of a record is to be stored in an official City repository.

### G. Records of Exiting Elected Officials, Appointed Advisory Body Members, Employees, and Contractors

When an elected or appointed official’s term ends, the elected or appointed official is to work with the City Clerk and Information Systems Manager to transfer records to the City



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Clerk's Office to comply with the requirements of this Policy and any supporting procedures for retaining and managing of records of the exiting official.

When an employee or contractor leaves the City, the exiting individual's supervisor or manager is responsible for complying with the requirements of this Policy and any supporting procedures for retaining and managing the records and information of the exiting employee or contractor.

### **H. Suspending Retention Requirements**

Records and information relevant to litigation or an investigation and subject to a Legal Hold are to be retained and preserved until further notice from the City Clerk, regardless of the retention period set forth in the Records Retention Schedule.

Records and information subject to a Legal Hold that are no longer required for business purposes may be transferred to offsite or inactive storage in coordination with the City Clerk and IT, as needed.

### **I. Information Protection**

Disaster recovery backup media are exact copies of an operating system, associated application and data created for the sole purpose of recovering data in the event of a disaster or business disruption. Backups serve as a level of protection for electronic systems and the data that is stored on those systems and are not subject to the retention requirements of the Records Retention Schedule.

## **DEFINITIONS**

### **Records**

Records are either defined specifically in applicable statutes, Municipal Code, City business practices, or, in the absence of specific practices, a record is the document or information generated as the final output of a business process or business decision.

### **Convenience Information**

Not all information or data is a record. Some information is collected or created in order to complete a task or to enable the creation of a record, but the City is not obligated by law to retain it. This type of information is classified as Convenience Information. Convenience Information has no retention requirements. Examples of Convenience Information are included in *Attachment A*.

### **Electronic Communication**

Electronic Communication is a message or document created or received via an electronic



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messaging system, including any attachments that may be transmitted with the message, along with its descriptive transmission metadata.

### **POLICY REVIEW**

This Policy and the accompanying Records Retention Schedule may be amended or modified from time to time, as necessary, to account for changes in legal, regulatory, or operational requirements.

### **REFERENCES**

- Records Retention Schedule
- Records and Information Management Glossary of Terms



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### **ATTACHMENT A**

#### Examples of Convenience Information

- Identical copies of documents,
- Extra copies of printed or processed materials kept only for convenience or reference (e.g. copies of expense reports once they have been paid),
- Miscellaneous notices of employee meetings, holiday notices, reference materials, and hand-written notes
- Templates created to standardize the appearance or content of documents,
- System backups,
- Notes, working papers, or drafts assembled or created in the preparation of other documents, worksheets, and rough drafts of letters, memoranda, or reports,
- Catalogs, trade journals and other publications or papers received from external companies or agencies that are used for reference purposes require no action, and are not part of an official record, and
- Materials used for information gather purposes, such as blank forms, stocks of publications, or supporting documents kept for supply purposes or to create a record.