



**TSAWWASSEN FIRST NATION**  
**s̓əwaθən məsteyəx<sup>w</sup>**

**Tsawwassen First Nation**

**Policy for Records and Information Management**

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## 1. RECORDS AND INFORMATION MANAGEMENT POLICY STATEMENT

The purpose of this policy is to establish the authority and responsibilities necessary to effectively manage the records of the TFN, to ensure that they are organized, secure, retrievable and legible, maintained under appropriate conditions, retained according to statutory requirements, and managed throughout their life cycle. Effective and efficient records management is an important contributor to the success of any organization, and TFN is no different. The policy applies to all staff and will be administered by the Government Services Department. In order to facilitate compliance, staff will be provided with a procedure manual which details standard procedures and practices for maintaining records.

Records are evidence of business activities and processes; they document an organization's decisions and actions, and their outcomes. Records that are created or received by the TFN government and its departments must be maintained in a manner that meets relevant operational, legal, regulatory and fiscal requirements. The creation and use of records must be done in compliance with the Tsawwassen *Freedom of Information and Protection of Privacy Act* (FIPPA), which provides qualified persons with access to records or information and sets out standards to protect personal information collected by TFN.

This policy ensures that TFN government records will be well-managed and preserved in such a way that records remain *authentic*, reliable, trustworthy, secure, complete, and are accessible over time and location regardless of format.

This policy is complemented by the Tsawwassen Records and Information Management Standard (TRIMS), which must be approved by Executive Council. Records must be managed, preserved and disposed of in accordance with TRIMS – see Section 5 of this Policy.

## 2. DEFINITIONS

*Please note: in this document, words appearing in italics indicates that a definition for the term can be found in this section.*

**Active Records** – records that are part of or necessary for an on-going business process or procedure, and/or records that are required for day-to-day operations of the organization. Active records are normally kept in the office that created them.

**Agent** – a person who is contracted to provide a service and/or an intellectual product, such as a research report, to the TFN Government, whether that person is contracted individually or as an employee of an external organization.

**Authenticity** – the authenticity of a record and whether a record can be proven to:

- be what it purports to be,
- have been created or sent by the person purported to have created or sent it, and

- have been created or sent at the time purported to have been created or sent.

**Classification Scheme**— the systematic identification and arrangement of business activities and/or records into categories according to logically structured conventions, methods and procedural rules. The Tsawwassen Records and Information Management Standard (TRIMS) provides a function-based, hierarchical classification scheme for organizing and grouping records that serve a similar or related purpose within the organization. The TRIMS classification scheme identifies and describes the organization’s records, provides instructions for the management of those records throughout their life-cycle, and identifies the final disposition of records when their life-cycle is complete.

**Confidential Information** – information whose disclosure could be expected to harm the privacy of individuals, the interests of the TFN as an organization and/or Tsawwassen Members as a whole, or the commercial or financial interests of a third party. TRIMS Secondaries that are flagged as containing Confidential Information are subject to more rigorous security measures.

**Destruction** –the process of eliminating or deleting records, beyond any possible reconstruction.

**Disposition** – the range of processes associated with implementing records retention, destruction or transfer decisions which are documented in approved classification systems and retention schedules.

**Document** – recorded information or object (e.g. photo, map, drawing etc.) which can be treated as a single unit; documents fall into one of two sub-sets – 1) documents that are also records, or 2) documents that are not records.

**Electronic Records** – consist of data and information which are input, created, manipulated and/or stored on electronic media to assist with and provide evidence of actions and decisions of an organization. Records coded for manipulation by computers are stored in formats not intelligible without the use of appropriate hardware, software and manuals.

**Essential records** – records that are necessary for the organization to respond to and recover from a disaster. These records fall into 3 categories: a) emergency preparedness and response records, which document procedures and protocols for responding to an emergency situation, b) records that are immediately necessary to begin the recovery of operations after a disaster, and c) rights-and-interests records that are necessary to protect the assets, obligations, and resources of the TFN, its’ employees, and Tsawwassen Members.

**File** – the logical arrangement of a set of related documents into a unit, uniquely identified, arranged in a logical sequence, and classified and scheduled together. A file is not a physical entity, but rather an intellectual grouping of records (possibly consisting of multiple media and formats) that together provide evidence of a complete activity, process or transaction A **file** is distinguished from a **folder** in that the file represents an intellectual grouping of records, regardless of physical location or proximity. A file may consist of multiple folders held in multiple physical locations.

**Filing System** – a means of organizing groups of files that enables staff to locate and retrieve individual files or folders. Filing systems may employ one or a combination of the following arrangement methods: numerical, alphabetical, chronological, subject-based.

**Finding Aid** – a tool that facilitates identification, location and retrieval of documents, folders, or files within a collection of records. A finding aid can also be used to consolidate information about a

collection of records and assist users with gaining access to and understanding the collection. Finding aids come in many forms, including indexes, shelf or container (e.g. box) listings, and file registers.

**Folder** – a physical or electronic grouping of documents into a single location. A single folder may be a component of a larger file, or may by itself constitute an entire file.

**Function Group** – a broad classification that defines the functions carried out by the Tsawwassen First Nation as a government. The Function Group is the top level of the TRIMS hierarchical function-based classification scheme. Each Function Group represents a distinct sphere of administrative or operational responsibility for the TFN as an organization. Function groups are broken down into Primaries and then Secondaries.

**Inactive records** - Records that are no longer used for operational purposes, but which are preserved for legal, historical, or institutional memory purposes. Inactive records are normally retained in an archival facility.

**Integrity** – the integrity of the records management system. Good integrity means that a system is operating properly, is trustworthy and reliable and produces true copies of original records; integrity of records proves that records from the records management system were made in the usual and ordinary course of business and capable of being retrieved from the records management system.

**Office of Primary Responsibility (OPR)** – the business unit that has operational jurisdiction over the business process or procedure which generates the records under a particular TRIMS secondary classification, and therefore has authority over those records.

**Personal Information Bank (PIB)** – a collection of personal information that is organized and capable of being retrieved by an individual's name or some other personal identifier. Secondaries that are flagged as PIBs are subject to more rigorous security measures.

**Primary** – a classification that defines a category of activities carried out by the organization to fulfill its administrative and operational mandate. The Primary is the middle level in the TRIMS classification scheme. Each Primary represents a range of activities or procedures that the TFN engages in to meet its responsibilities and fulfill the organizational functions defined by the Function Groups.

**Portable Storage Devices / Media** – means disks, USB memory sticks, removable memory cards, MP3 players, CDs /DVDs, portable hard drives, laptop computers, smart phones, blackberries and other small data recording technologies.

**Record** – information created, received or maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business and includes books, documents, maps, drawings, photographs, letters, vouchers, papers and any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means but does not include a computer program or any mechanism that produces records.

**Records and information management (RIM)** – the systematic control of an organization's records and information assets throughout their life cycle, including policies, procedures, standards,

technologies, and other administrative controls that are applied to records and information assets. RIM functions include the implementation of filing systems and/or classification schemes, the creation of records retention and disposition schedules, the protection of essential records, and the preservation of archival records.

**Records Life-cycle** – the distinct phases of a record’s existence, from initial creation/receipt until its final disposition. The records life-cycle can be divided into 3 phases: active, semi-active, inactive.

**Retention and Disposition Schedule** – approved procedures regarding a) the length of time that a record will be retained during the active and semi-active phases of its life-cycle, and b) the designation of its final disposition at the end of that period of time (permanent retention or destruction).

**Records value** – Records are valued based on the fiscal, legal, audit, historical or culture requirements. Records with long term value include those that show evidence of decisions made during the transaction of business; authorizes or completes a business transaction; documents an approval to proceed with specific course of action; contains rationale, methodology or approach taken for a business action; contains policies or procedures specific to mandate/functions; contains technical specifications or instructions; contains billing, expenditures, transfer of money or other financial transaction; contains information required for future comparative analysis; contains historical significance or documents significant change in operations; contains case/client specific information required for future reference; documents executive updates such as briefing notes, final reports and recommendations

**Secondary** – a classification that defines a specific business process or activity carried out by TFN staff members and/or elected officials as part of day-to-day operations, and identifies records that are used to carry out that business process and/or are generated by that business process. The Secondary is the final level of the TRIMS classification scheme – it is the level which is applied to physical or electronic files. Each Secondary encompasses the following:

- a description of the business procedure or process and its purpose
- a description of the records that are included under the secondary
- a retention schedule that identifies what causes the file to be closed and how long those records should be retained
- a disposition schedule that identifies what happens to the records at the end of their retention period
- the Office of Primary Responsibility (OPR) for the records falling under the secondary
- whether the secondary constitutes a Personal Information Bank (PIB)
- whether the secondary constitutes Essential records
- whether the secondary includes Confidential Information

**Semi-active Records** – records that the organization must retain for legal, financial, operational, or auditing purposes, but are no longer required for day-to-day operations. For example, a file related to a completed project, where the file is closed (i.e. documents are no longer being added to it), and

is no longer being referred to for day-to-day operations, would be considered semi-active. Most of the TFN's semi-active records are kept in an off-site storage facility.

**Transitory records** – means records of limited temporary value, which do not document business activities, processes or transactions and therefore are not required to be integrated into the record keeping system. Examples of transitory records include:

- personal collections (personal messages, pictures, reference material);
- documents distributed broadly for temporary reference purposes, where the authoritative version of the document has been classified and incorporated into the record keeping system by the OPR;
- items that are needed for short period of time to organize a business activity or transaction (e.g. phone messages, meeting requests, change-of -venue notifications, to-do lists, reminder notes, etc.);
- items downloaded from web and not required as a corporate resource for day to day business;
- invitations, agendas, programmes, reference materials for conferences, seminars, and training events organized by outside organizations (unless the TFN is a participant or partner in the event);
- broadly distributed emails – administrative and organization updates, job postings, location changes, community notices, etc. – received as part of a distribution list;
- draft or redundant versions of documents that are not required to demonstrate the development of the final document

**Version control** – means the management of multiple revisions to the same document. Version control is important for documents that undergo a lot of revision and redrafting and is particularly important for electronic documents because they can easily be changed by a number of different users, and those changes may not be immediately apparent. Knowing which version of a document you are looking at is important if you are trying to find out which version of a policy is currently in force, or which version of a policy was in use at a particular time. Version control is also important if you are working on a collaborative document with a number of contributors and/or frequent revisions.

### 3. SCOPE AND APPLICABILITY

This policy applies to all TFN employees as defined by the Tsawwassen *Government Employees Act*:

“employee” means a person employed by the Tsawwassen Government, regardless of the method of employment, but does not include

- the chief administrative officer, or

- an employee of a corporation established by the Tsawwassen First Nation unless designated by the Executive Council as an employee for the purpose of this definition.

Notwithstanding the definition of employee as it appears in the Act, this policy also applies to the office of the Chief Administrative Officer.

The TFN Economic Development Corporation (TEDC) may adopt this policy, implement the Tsawwassen Records and Information Management Standard (TRIMS) in whole or in part, and participate in the TFN corporate records and information management program.

This policy applies to all records created, received, and/or maintained by TFN employees and those acting as *agents* in the course of their duties on behalf of TFN, regardless of physical form or characteristic (including but not limited to paper, electronic, emails, databases, audiovisual, plans, drawings, photographs, etc.).

All records that are created by TFN employees and by those acting as *agents* in the course of their duties on behalf of TFN are considered TFN property and subject to its control.

#### **4. ROLES AND RESPONSIBILITY**

This policy sets out individual and departmental responsibilities for the administration of records and information management and establishes standards that must be followed by all employees.

The Government Services Department oversees the management of TFN records and information assets to ensure compliance with corporate policies and standards (see Schedule A). This includes the development, implementation, and management of the Tsawwassen Records and Information Management Standard (TRIMS); establishing requirements, policies, standards and guidelines related to records and information management, subject to approval by the Executive Council; corporate coordination, approval and tracking of record storage, transfer, and disposals; and corporate coordination of projects to develop, implement, and maintain new records and information management technologies.

TFN employees must treat official business records as a corporate resource and manage them in accordance with applicable requirements, policies, standards, and guidelines established by the Government Services Department and approved by the Executive Council.

Department managers are responsible for liaising with the Government Services Department regarding requirements for managing the records within their respective departments, including but not limited to the need to create new records *classifications* and/or make adjustments to existing *classifications* or *retention and disposition schedules*.

TFN employees must be aware of their requirements under the FIPPA. Inappropriate handling of official records as per the requirements of that Act and of this policy will be investigated on a case-by-case basis.

Individuals who misuse records and other government information resources may be subject to disciplinary action, up to and including dismissal, cancellation of contract, and/or other available legal remedies.

## 5. TSAWWASSEN RECORDS AND INFORMATION MANAGEMENT STANDARD (TRIMS)

TRIMS is the records *classification*, document management, and records schedule standard for the TFN government. It is for the use of all TFN government departments and staff, and covers records in all media, including hard copy, audio-visual, and digital formats.

TRIMS integrates the following records and information management tools into a single comprehensive standard:

**TRIMS is a records classification scheme:** it is used to organize, describe, and provide physical and intellectual control over groups of TFN corporate records. TRIMS is organized according to business functions, processes, activities and transactions. It serves as a naming convention by specifying the classification titles for all corporate records.

**TRIMS is a filing standard:** it is used as the basis for filing systems, network directory hierarchies, and document libraries and hierarchies in digital document management systems. It provides a common base for identification and management of all corporate records and is the basis for the filing structure of Electronic Records and Document Management Systems (ERDMS).

**TRIMS is a records schedule:** it prescribes a life-cycle plan for each type of corporate record. TRIMS defines the requirements for the maintenance and preservation of TFN's records, sets out the periods of time that records are considered active and are in the custody of the departments, when records are semi-active and can be transferred to storage (either on-site or off-site), identifies those records that are to be retained permanently, and sets out the time and method for destruction of records that are not of permanent value.

In addition, TRIMS will accomplish the following:

- Designate an *Office of Primary Responsibility (OPR)* for every record retained by the TFN as an authentic, master record
- Identify all *Personal Information Banks (PIBs)* held by the TFN
- Identify all *Essential Records* held by the TFN
- Identify records classifications that include *Confidential Information*

## 6. DEPARTMENTAL RESPONSIBILITIES FOR RECORDS MANAGEMENT

### 6.1 Role of the Government Services Department

- 6.1.1 The Government Services Department will be responsible for providing a framework for the management and control of the creation, receipt, use, access, storage and maintenance, *retention and disposition*, and preservation of the TFNs corporate records.
- 6.1.2 The Government Services Department will be responsible for the development and maintenance of corporate policies, standards, procedures and guidelines related to records an information management, subject to the approval of the Executive Council.
- 6.1.3 The Government Services Department will provide corporate co-ordination to implement and manage new records and information management technologies, including but not limited to the implementation of an Electronic Records and Document Management System (ERDMS).
- 6.1.4 The Government Services Department will provide assistance to other departments and staff in support of the implementation of this policy and the associated standards and procedures related to records and information management, including:
- Consultation and advisory services
  - Assistance with the implementation of TRIMS and its associated *records schedules*
  - Assistance with the development, implementation, maintenance, and documenting of departmental *filing systems*
  - Assistance with the implementation and use of an Electronic Records and Document Management System (ERDMS)
  - Advice on the implementation of other technologies that may have an impact on records and information management
  - *Records and information* management training
  - Co-ordination of storage and retrieval of records held in an off-site storage facility, and co-ordination of destruction of records occurring on-site.
  - Co-ordinating the preservation of records that have long-term or permanent value to the TFN

### 6.2 Creation/collection of records

- 6.2.1 All corporate functions, policies, decisions, procedures, activities and transactions must be documented in official records.

6.2.2 Official records must be captured and incorporated into corporate recordkeeping systems as soon as practicable following creation or receipt.

6.2.3 Collection of personal information is only permissible if it relates directly to and is necessary for operating a program or activity and must be managed in accordance with the provisions outlined in the FIPPA.

### **6.3 Maintenance and use of records**

6.3.1 Departments, with the assistance of Government Services' records management staff, must establish, maintain, and document office filing systems that facilitate safekeeping of records, and provide for effective organization, identification and retrieval of records; departments must ensure that their records are maintained in such a manner that they can be produced upon demand or with minimal effort.

6.3.2 Departments, with the assistance of Government Services' records management staff, must keep current and accurate file inventories and *finding aides* for all active records in their custody or under their control, and for all *semi-active records* that they have transferred to off-site storage.

### **6.4 Storage and disposition for hard copy records**

6.4.1 Departments will ensure that records are retained for the length of time specified by TRIMS records *retention schedules*, and that final *disposition* of records is carried out in accordance with TRIMS records disposition schedules.

6.4.2 Records requiring long term *semi-active* storage will be moved to an off-site records storage facility.

6.4.3 Approval / signoff from the departmental manager is required before records can be transferred to an off-site storage location.

6.4.4 Records that are being transferred into a storage area or to an off-site storage facility must be boxed and inventoried according to the standards approved by the Government Services Department, as outlined in the Records and Information Management Procedure Manual.

6.4.5 Records (except for *transitory records*) can only be destroyed in accordance with TRIMS records *disposition* schedules; the appropriate department manager and the Chief Administrative Officer must sign off before the destruction of records can be carried out.

6.4.6 Destruction of all records must be carried out under controlled, confidential conditions by shredding or permanent erasure; only non-business records and records that contain no confidential or personal information may be recycled, all other records must be shredded.

6.4.7 *Transitory records* are to be routinely disposed of when their useful life has passed and do not require approval or signoff from a manager or department head.

## **6.5 Storage for electronic records/files**

6.5.1 All official TFN government records that are created and/or maintained in electronic or digital format must be managed as information assets in accordance with this policy, and are subject to the same requirements for creation/collection, maintenance, use, storage, and disposition as records that are maintained in hardcopy.

6.5.2 In cases where records are maintained in both electronic and in hardcopy format, the *filing system* used to organize and facilitate retrieval of records in hardcopy should also be used to organize electronic versions of records on the shared network drive.

6.5.3 All official records in electronic or digital format must be stored in the appropriate location on the shared network server; they must not be retained or stored long-term on computer hard drives, personal drives, computer desktops, portable storage devices or email accounts.

6.5.4 TFN email accounts are provided to individuals as a communications tool and are not intended to be used for document management purposes or for the long term storage and retention of official business records. Documents that are transmitted via email should either be printed and stored in the appropriate hard copy file, or saved to the appropriate location on the shared network.

6.5.5 Private email accounts provided through hotmail, gmail and similar service providers are not to be used for storage of TFN business records for any length of time. Some of these services are bound by access laws from other jurisdictions and security and retention practices do not meet TFN requirements.

6.5.6 Any records stored on a *portable storage device* must be managed in accordance with this policy and with the TFN Information and Technology Management Policy; in addition, these records should be transferred to the TFN shared network as soon as practical and then deleted from the portable storage device.

## **6.6 Electronic storage of non-official records**

6.6.1 Documents or other material that are not TFN official records such as personal email, personal photos, music files, etc. must not be stored on the TFN shared network server.

6.6.2 Records in electronic format that are temporary or transitory in nature should be routinely purged from the shared server storage.

6.6.3 Employees are expected to monitor and periodically review their email folders, personal drives, computer hard drives, and computer desktops so that records can be deleted or transferred to shared network drives as appropriate. Over time, employees will be expected to:

- delete all personal email, , and any emails that are transitory records (e.g., emails arranging meeting times, lunch dates, etc.);
- remove or deleted any personal items from the shared network folders (e.g., family pictures, jokes, audio files, streaming video, MP3 files, recipes etc.);
- delete any *transitory records* or duplicate copies of records that are no longer required for reference purposes and do not need to be incorporated into the corporate records classification scheme;
- move any items that are official business records requiring *classification* and retention to the appropriate folder on the shared network server or print and file in the applicable hard copy folder.

## 6.7 Records Security

6.7.1 Access to TFN government records will be managed using prescribed policies and procedures.

6.7.2 Records falling under a *classification* that is identified in TRIMS as containing *Confidential Information* or as a *Personal Information Bank (PIB)* must be stored in a secure manner so that access can be limited to authorized persons.

6.7.3 All *portable devices* used to store personal and sensitive information must be secured in accordance with the TFN Information and Technology Policy, in order to prevent unauthorized access to records.

## 7. ESSENTIAL RECORDS

All TFN records designated as Essential Records, that is records that are essential to the TFN government's continued operation and which if destroyed would seriously or irreparably disrupt the TFN's ability to conduct its affairs, or which by their loss would place the TFN in legal or fiscal jeopardy, will be managed in accordance with the TFN Essential Records program.

The Tsawwassen Records and Information Management Standard (TRIMS) will include a designation for every records classification that includes Essential Records, and will serve as the means for the TFN to identify all of its Essential Records.

The Government Services Department will be responsible for overseeing the TFN Essential Records program, and for assisting other departments with the implementation of Essential Records procedures.

Department managers are responsible for ensuring that the Government Services Department is provided with an up-to-date listing of all Essential Records under the custody and control of the department, including file or document titles and location (physical location and/or location on shared network drives).

## **Schedule A – Policies, Procedures and Standards**

The following is a list of corporate policies, procedures, and standards that are directly applicable to the management of TFN’s corporate records and information assets. Please note that this list is not exhaustive, and that additional sections to the ones listed below and/or other policies and/or procedures may have indirect implications for the management of corporate records and information assets.

Human Resources Policy (sections 1.6, 1.7, 4.1, 7.1-7.3)

Information Technology Policy (all sections)

Judicial Council Firewall Policy (section 3 – Process)

Processing Access to Information Policy (all sections)