

Digital Image Management Policy

Policy No.: No. CIMS-014

Version No.: No. 1.0

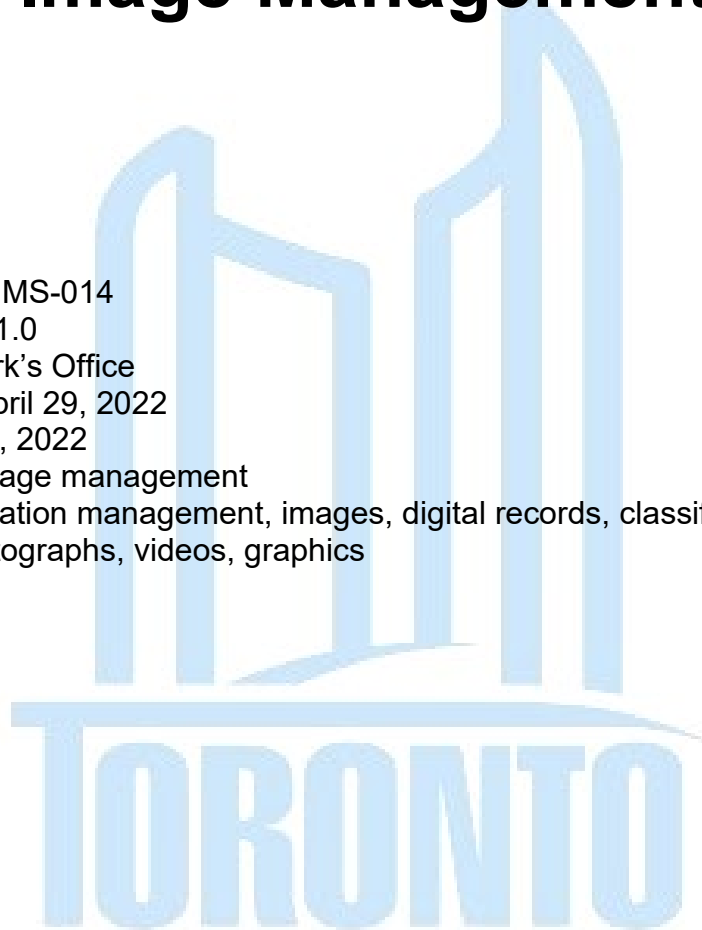
Division: City Clerk's Office

Approval date: April 29, 2022

Issued On: May 3, 2022

Subject: digital image management

Keywords: information management, images, digital records, classification, disposition, visual assets, photographs, videos, graphics



Foreword

City of Toronto Information Management Policies and Standards are the official publication on the policies, standards, directives, guidelines, position papers and preferred practices given oversight under delegated authority of [Toronto Municipal Code, Chapter 217, Records, Corporate \(City\)](#). These publications support the City's responsibilities for coordinating standardization of Information Management in the City of Toronto.

Acknowledgements

This Policy acknowledges the efforts, subject matter expertise, and oversight provided by the following:

Project Sponsor: **Kristie Pratt** Deputy City Clerk, Corporate Information Management Services, City Clerk's Office

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- Corporate Information Management Services
 - Corporate Information Strategy and Policy
 - Records Services
 - Archival Services
 - Privacy and Information Collection
 - Information Access
- Legal Services
- Strategic Communications
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- Technology Services Division
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1.0 Introduction

The Digital Image Management Policy outlines requirements for the management of digital images at the City of Toronto, including storage, access, and use. Setting a policy direction for the management of digital images addresses their unique Information Management (IM) requirements, while increasing security, improving access, reducing inefficiency and waste, and enabling information sharing.

This Policy establishes that digital images created, commissioned, or purchased in the course of City business and administration of City Services, are records and corporate assets, and must be properly managed and maintained. This Policy defines digital images as digital assets that provide value through the visual representation of people, places, events, ideas, and business activities. Digital images include photographs, videos, icons, and graphic design files. Images that constitute business records must be managed in accordance with Chapter 217 of the Toronto Municipal Code.

As corporate assets, digital images have high business value in the production of City communications, marketing materials, reports, publications, documentary evidence, and educational materials. Improper management of images can result in harms, including copyright infringement, breach of privacy, reputational damage, and loss of financial investment in image production and purchase. This Policy establishes the need for a corporate solution to enable the proper management of digital images. The City Clerk's Office is the business owner of the [Image Library](#), an enterprise service and technology solution, which supports the storage, management, and retrieval of images. The Image Library consists of:

- The **City Share**, a central repository, which houses images that are pre-approved for reuse by all City staff; and
- Segregated **Divisional Workspaces**, which contain images managed by Divisions that may require review or authorization for use.

Appendices 1 and 2 include additional information on the Image Library's administrative roles and processes.

2.0 Purpose

This Policy identifies processes and roles required to ensure that image-based records created by the City can be managed and accessed in accordance with the [Toronto Municipal Code, Chapter 217, Records, Corporate](#), the [Canadian Copyright Act](#), the [Municipal Freedom of Information and Protection of Privacy Act](#), the [Limitations Act](#), and any other legislation relevant to City business, such as the [Personal Health Information Protection Act](#). In addition, application of this Policy supports centralization and standardization of approaches to digital asset management which add business value to City assets by improving the description, findability, usability, and auditability of images.

This Policy contributes to the City's [Digital Infrastructure Plan](#), and its commitment to fostering a well-run city, which includes the management of City Records and information to:

- Establish the City's responsibility to manage digital images and meet recordkeeping obligations.
- Improve the City's transparency and accountability.
- Improve accuracy of business intelligence and analytics activities to better inform decision-making.
- Safeguard the City's records and information from unauthorized use.
- Support access to digital records for greater business efficiency.

Standardize the lifecycle management of digital images to support a culture of collaboration and information-sharing.

3.0 Application

This policy and its supporting procedures apply to City Divisions and Division Heads as defined in Toronto Municipal Code, Chapter 217, Records, Corporate.

This policy does not apply to Elected Officials, Accountability Officers, or City Agencies and Corporations.

4.0 Scope

Aligned with Toronto Municipal Code, Chapter 217, Records, Corporate, this Policy addresses:

1. digital images that constitute City Records; and
2. documentation that supports the management of and access to the images, such as consent forms, contracts, and reproduction agreements.

This Policy addressed both “born digital” and digitized images that are stored in formats that are accessed and rendered electronically. This Policy applies to digital images that are in a finalized or complete state.

This Policy does not apply to transitory records, such as derivative images, duplicate images, work-in-progress images from which a final version was created, outtakes from voluminous photo shoots, screenshots, social media materials, and corporate communications.

This Policy does not apply to digitized textual records.

5.0 Policy Statement

The City will:

- Provide City Divisions with centralised access to existing images that depict the City's business, operations, services, property, physical assets, events, staff, and resources.
- Increase awareness of the business value of images and their status as City Records.
- Provide training to address gaps in knowledge and skills for the creation, management, and publication of high-quality images.
- Monitor and manage the lifecycle of digital images as corporate assets.
- Develop a community of practice to provide image users with tools, training, and opportunities for collaboration.
- Ensure that the City will not act as a broker for, collect licence fees on behalf of, or provide royalty payments to photographers, videographers, or artists whose work is featured in an image.
- Protect and respect the copyright of images in the City's custody. Images are reproduced and distributed only if the City holds copyright, or the rights holder has provided permission.

6.0 Principles

The Digital Image Management Policy is the foundational policy outlining key principles for managing digital images, to be supported by procedures and guidelines on quality control, governance, usage, and digital image lifecycle management.

Image Management is underpinned by the following principles:

Centralized Governance

- The City will maintain and administer the Image Library service for image storage and access. Divisional use of the Image Library service is optional but recommended. Using the Image Library ensures that information security and privacy is protected; image formats are normalized for reuse in print and web publications; image-specific metadata is captured; images are findable; and images are segregated for internal or Divisional use where appropriate.
- City staff can only use images they have the right to, through contracts, licenses, or agreements as recorded in the repository.
- Images must not be duplicated by City staff for the purpose of separate storage or management. Images may be duplicated to enable internal and external publication and sharing of images, where appropriate.

Accountability

- Images that qualify as City Records are subject to the City's Records Classification Series and the records management processes outlined in the [Toronto Municipal Code, Chapter 217, Records, Corporate.](#)
- City Divisions are responsible for the description, management, and quality control of their digital images, including images created or reproduced by a third party on their behalf.
- Images which do not meet the legislated or contractual requirements for unrestricted use by all City Divisions or staff are restricted to the Division they were created for, and the accountability for their use rests with that Division.
- City Divisions are responsible for the identification and disposal of images with transitory value.
- Digital images created by the City that no longer serve a current operational use and that have reached the end of their records retention period will be dispositioned according to Toronto Municipal Code, Chapter 217, Records, Corporate. This may include acquisition by the City of Toronto Archives.

Accessibility

- The City will manage access permissions so that authorized City staff can find, view, and use images to fulfill the City's business and legislative requirements.
- Images are reproduced and distributed only if the City has the rights to do so.
- Images are made accessible to the public according to the access and privacy provisions of Municipal Freedom of Information and Protection of Privacy Act, and where applicable, the Personal Health Information Protection Act.
- Images must not be published or reproduced by external parties, Agencies or Corporations unless they are covered by specific licensing, permissions, or usage agreements which name the external Image Users or allow the City to transfer reproduction rights to third parties.
- Images deemed inappropriate, outdated, misleading, sensitive, or otherwise not suitable for use by the divisional owner (but retain value as records, documentation, or evidence) may be made inaccessible to divisional staff without elevated permissions.

Integrity

- Images are assigned metadata that supports their identification, reuse, release, preservation, and records management.
- Images containing Personal Information or Personal Health Information are protected against unauthorized staff access, in line with the City's Protection of Privacy Policy, the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), and the Personal Health Information Protection Act (PHIPA).
- Images are protected against unauthorized change or deletion.
- Images are stored in formats that are useable by City staff.

Collaboration

- Digital Asset Management technologies and services are chosen and procured to meet the accessibility and usability requirements of the City's users.
- The City enables and promotes cross-divisional sharing and use of images where the necessary legislated and contractual requirements have been met to do so.

The City takes an enterprise-wide approach to digital asset management to ensure that where common business needs exist, shared service delivery options are available.

7.0 Roles & Responsibilities

7.1 City Clerk

City Clerk will:

- Act as corporate sponsor and advocate for the Image Library service and the management of images.
- Lead the corporate development and implementation of image management strategies, policies, standards, procedures, best practices, programs, and systems as a framework to promote City transparency, accountability, and the management of City information.
- Build access to information and privacy by design into technologies used for the management of images.
- Provide advice and guidance to enhance the effective and efficient lifecycle management of images within City Divisions to meet legislative requirements.
- Maintain the effectiveness of the Image Library service through technology enhancements, systematic content reviews, and quality control processes.
- Promote the adoption, management, and use of the Image Library service for digital image management.
- Provide guidance in the lifecycle management, records classification, retention, and disposition of digital images held by all City Divisions.
- Consult on the governance, systems and services for the management, storage, preservation, and description of images which are in current operational use.
- Enable processes for the public to access digital image records, as needed.

7.2 Chief Technology Officer

Chief Technology Officer will:

- Integrate information and records management requirements into technology architectures, policies, standards, and implementation activities, in accordance with the requirements of Municipal Code Chapter 217, Records, Corporate.

- Implement, enable, and decommission technology solutions that meet the requirements of the Ontario Information & Privacy Commissioner's Privacy by Design principles and Access by Design principles, in collaboration with the City Clerk.
- Support the alignment of technology capabilities with divisional business objectives, including potential system integrations with the Digital Asset Management platform.
- Delegate Technology Services Division resources to provide corporate technical support in the deployment, sustainment, and integrations of the Image Library.

7.3 Division Heads

Division Heads will:

- Manage images in their Division in accordance with MFIPPA, PHIPA, the Protection of Privacy Policy, the Information Management Accountability Policy, and other relevant legislation and City policies.
- Communicate, implement, and support compliance in their Division with all records and Information Management policies and standards established by the City Clerk.
- Serve as the Image Steward for their Division, as defined in Appendix 1.
- Designate a management-level employee member to represent the Division and its Image Library Clients.
- Ensure that employees are properly trained and have access to learning opportunities and relevant information to increase their awareness, knowledge, and adoption of digital image management requirements and related policies.
- Maintain the authenticity, reliability, usability, and integrity of digital images to meet operational needs.
- Ensure that governance to support the maintenance and quality control of images is incorporated into divisional roles and processes.
- Maintain supporting documentation that demonstrates compliance with privacy and copyright legislation, outlines specific licensing agreements, contractual agreements, or limitations of use, and ensures legal and contractual obligations are met.
- Provide resources for management of divisional digital images as needed.

7.4 City Staff

City Staff will:

- Foster a culture of openness and transparency through collaboration, information-sharing and open use of images from the Image Library.
- Comply with this Policy and related information management policies, standards, and practices
- Manage personal information in accordance with the City's Protection of Privacy Policy.
- Take necessary steps to keep themselves informed of Digital Image Management Policy requirements that relate to their areas of decision-making and availing themselves of training and educational opportunities.
- Dispose of transitory records when appropriate.
- Ensure the accuracy, integrity, authenticity, usability, and reliability of metadata for records they create, receive, and manage.

Appendix 2 contains additional information of the Image Library's administrative roles and responsibilities relating to the upload, management, use, and removal of digital images.

8.0 References

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9.0 Policy Approval

Provided by Kristie Pratt, Deputy City Clerk, Corporate Information Management Services, City Clerk's Office, effective April 29, 2022

10.0 Policy Review

The City Clerk's Office will review this Policy and its effectiveness as needed.

Appendix 1 - Image Library Administration and Operations - Requirements for Image Upload and Removal

Operational Roles and Responsibilities

The Image Library operates on a dispersed staffing model for the upload, cataloguing, description, and records classification of digital images. See [Appendix 2](#) for detailed staff roles and responsibilities.

Staff assigned the roles of [Image Cataloguer](#) or [Image Administrator](#) are responsible for working to the standards established by their user group, Division, this Policy, and the Procedural Guide for the City of Toronto Image Library. To ensure accountability, staff must attend and maintain current training for their specific Image Library roles, after which time access and permissions to perform duties will be granted.

Baseline Requirements for Image Upload

Images uploaded to the Image Library are required to meet specific criteria. See the Procedural Guide for the City of Toronto Image Library as well as the Image Library Intake Form for more details.

Images Created by Staff

Images created by staff during their work are the property of the City. The copyright of those images is held by the City.

Commissioned Images

Contracts for the commission of images must be saved in the Image Library and linked to the related images, demonstrating the extent of the City's rights to reproduce and use photographic or video work created by an external contractor or vendor.

It is recommended that ownership of the copyright in any commissioned images be transferred to the City by contract, or otherwise that unlimited non-exclusive reproduction rights be purchased. Any rights granted to the City under such contracts must also be transferrable if the associated image(s) are intended to be used by an agency or corporation of the City (and not the City itself). The contracts for purchased stock images must be saved in the Image Library and linked to the related images.

Images of Works of Art

The reproduction of a work of art requires permission in writing from the copyright holder of the work of art. The permission form or agreement must be attached to the related Image Library image(s) to reduce the risk of copyright infringement and to help maintain good relations with partners in the arts community.

Purchased Stock Images

All Divisions are cautioned not to upload, manage, or share purchased stock images in the Image Library or on City servers unless expressly permitted to do

so by the vendor, as this may be in violation of stock image licensing agreements.

Stock Images must be accompanied by contracts which set out ownership, copyright, and the extent of reproduction permitted.

Personal Health Information

Images containing Personal Health Information should only be uploaded to the Image Library if the Image Steward, in consultation with the responsible Health Information Custodian (HIC), has determined that the Image Library meets the security and privacy requirements for Personal Health Information. The Image Steward is responsible for procuring and maintaining a separate storage repository for their images that satisfies their Health Information Custodian's privacy and security requirements, and the requirements of this Policy, if the Image Library is deemed unsuitable.

Baseline Requirements for Image Removal

Images and supporting documentation such as contracts or permissions are maintained in the Image Library for as long as required under the [Limitations Act 2002](#).

Images which qualify as records must be treated in accordance with records management legislation, as outlined in the [Toronto Municipal Code, Chapter 217, Records, Corporate](#) and [Schedule A – Records Retention Schedule, of Chapter 217 of the Toronto Municipal Code](#). Transitory records may be removed by the business area in compliance with Chapter 217, as well as the requirements under the Procedural Guide for the City of Toronto Image Library.

Image Library staff may advise Image Stewards, Image Cataloguers, and Image Administrators on the removal of digital images from the Image Library which are no longer relevant or of operational use.

Image Library Procedures

Detailed procedures for the digital asset management of images are provided in the following supporting documents:

- The Procedural Guide for the City of Toronto Image Library provides a detailed overview of image management requirements as they relate to staff roles, lifecycle management, records management, descriptive requirements, use and publication, and compliance with legal and legislated requirements.
- Image Library [Cataloguer User Guide](#) provides step by step instructions for the use of the current Digital Asset Management System administered by the City Clerk's Office.

Appendix 2 - Image Library Roles and Responsibilities

Role	Assigned to	Responsibilities	Requirements for Assignment of Role
Image Steward	Division Head or their designate	<ul style="list-style-type: none"> • Allocate staff resources required to maintain the quality of a Division's image holdings to meet information management (IM) or records management standards. • Promote the centralized and standardized management of images to support their IM and records management needs as outlined under Chapter 217 of the Toronto Municipal Code. • Designate a management-level employee as the primary contact for that Division with respect to the adoption and use of the Image Library service. • Manage images in the Division, while respecting user agreements and licensing conditions, all in accordance with the City's Acceptable Use Policy. • Maintain the authenticity, reliability, usability, and integrity of image records and image-based information to meet operational needs and accountabilities. • Signoff on Archival Review Transfer Authorization and Records Disposition Authorization forms for images eligible for disposition. 	Image Steward is assigned to the Division Head or their designate.

		<ul style="list-style-type: none"> • Ensure their staff's adherence to this Policy and the lawful publishing and reproduction of images from the Image Library. • Ensure that the cataloguing, management, distribution, and reproduction of images purchased, licensed, or created by and for their Division meets any obligations that apply under MFIPPA, PHIPA, and the limitations or conditions of use set out by the contractual agreement with the contractor, vendor, and copyright holder of the work, as well as the works of art, performances, or public figures that are reproduced in the images. • Ensure compliance with, and be accountable for, all vendor contractual restrictions on placing purchased images, including stock photography on servers, or sharing them with other individuals or groups. 	
<p>Image Administrator</p>	<p>City staff who have been assigned a user account for lifecycle management and quality control of their Divisional Workspace or their</p>	<ul style="list-style-type: none"> • Communicate changing operational requirements to the Image Steward, all divisional Image Library users, and the Image Library Lead. • Lead yearly Image Library content reviews. • Be responsible for the management of high-risk images and images made inaccessible to general staff to reduce risk. 	<p>Designated by the Image Steward, following Image Administrator training</p>

	<p>Division's images in the City Share</p>	<ul style="list-style-type: none"> • Exclude unedited duplicates, outtakes, or images that are otherwise transitory. • Vet images in keeping with their Division's operational requirements for quality control of resolution, file size, and clarity, prior to upload. • Consult with Records Services – City Clerk's Office on the application of records classification codes to applicable images and supporting documentation per Toronto Municipal Code, Chapter 217, Records, Corporate. • Review access and permission controls applied to Image Library content. 	
<p>Image Cataloguer</p>	<p>City staff who have been assigned a user account for the cataloguing and management of images in their Divisional Workspace or the City Share.</p>	<ul style="list-style-type: none"> • Upload, edit, maintain, and manage images in the Image Library in accordance with this Policy. • Describe, manage, and provide quality control of content loaded to the Image Library by a third party. • Transcribe the ownership, credit, rights, and limitations of use while uploading purchased or commissioned images. • Consult with Records Services – City Clerk's Office on the application of records classification codes to applicable images and supporting documentation per Toronto Municipal Code, Chapter 217, Records, Corporate. • Participate in cataloguer training if minimum standards 	<p>Designated by the Image Steward, following Image Cataloguer training and managerial sign-off.</p>

		<p>for image description are not met.</p> <ul style="list-style-type: none"> • Communicate changing operational requirements to the Image Steward, the Image Administrator, and the Image Library Lead. • Participate in yearly Image Library content reviews. 	
Image Library Client	<p>City staff who have been assigned a user account for access to images in their Divisional Workspace or the City Share.</p>	<ul style="list-style-type: none"> • Be responsible for the collection of permission forms or posting of notices of photography when commissioning photography. • Ensure images selected meet the requirements of the Image User. • Communicate any known restrictions, limitations, or risks to the Image User. • Share images only with City staff or City contractors. Images must not be used or published by external parties, Agencies and Corporations which are not covered by specific licensing, permissions, or usage agreements which allow such use. 	<p>Assigned to City staff following introductory training and managerial sign-off.</p>
Image User	<p>Any City staff who use Image Library resources available in the City Share.</p>	<ul style="list-style-type: none"> • Adhere to this Policy and the lawful publishing and reproduction of images from the Image Library. • Ensure that the reproduction of an image for publication, distribution, or other use meets any obligations that apply under MFIPPA, PHIPA, the Copyright Act, and any contractual limitations. 	<p>No requirements or training needed for staff to be Image Users.</p>

		<ul style="list-style-type: none"> When working on behalf of City Agencies and Corporations, ensure that the right to publish, distribute, or otherwise use an image is not limited to the City (which is the standard) and that specific rights have been accorded to the Agency or Corporation who intends to use it. 	
<p>Image Library Lead</p>	<p>Dedicated administrator role owned by Corporate Information Management Services, City Clerk's Office.</p>	<ul style="list-style-type: none"> Administer Image Library services, training, client support, and project management. Provide consultation and recommendations on image-related business processes and workflows. Implement technological controls, staff training, and resources to support compliance with legal and descriptive requirements for publication and use of images for City business. Engage with Image Library partners through an annual content review, and provide feedback to Image Stewards, Image Administrators, and Image Cataloguers regarding the quality control of Image Library image uploads, their descriptive metadata, content management, and image file disposition processes. Monitor adherence to Image Library Policy and procedures, and notify staff of need for action or remediation. Conduct systematic review of Image Library content, staff 	<p>Designated by the City Clerk.</p>

		<p>use, and system behaviour to develop reports for strategic planning, system improvements, and service modernization.</p> <ul style="list-style-type: none">• Verify the disposition of items included in Archival Review Transfer Authorization or Records Destruction Authorization forms.	
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Appendix 3 – Definitions

Term	Definition
Archival Records	Records designated by the City Archivist that warrant continued preservation.
Born-Digital Record	Digital materials which are not intended to have an analogue equivalent, either as the originating source or as a result of conversion to analogue form.
Business Value	The evidential and/or informational value of a digital image, paired with the currency of its operational use by the City,
City Record	A record created or received in the course of City administration or delivery of City services.
City Share	A shared portal accessible to all City staff which presents images that have been vetted by staff, filtered to meet minimum descriptive requirements, are approved for use by the Image Stewards, and are managed in a manner that meets any obligations that apply under MFIPPA.
Copyright	The right vested by law in the creator of an image and the creator's heirs or assignees to, among other things, publish or reproduce or display the image or to authorize publication or reproduction of the image.
Digital Asset	A media asset, including photos, audio, and videos, stored in a digital format that is managed or accessed using descriptive metadata.
Digital Asset Management (DAM)	A business process for organizing, storing, and retrieving digital assets and managing ownership, digital rights, and permissions.
Digital Record	Data or information that is fixed in a non-human readable format that is created or received during individual or institutional activity and set aside (preserved for a period of time) as evidence of that activity for future reference.
Digitized Record	Stored information originally created in analog or obsolete formats that is subsequently converted or migrated to electronic format in order to meet business requirements or facilitate ongoing access.
Duplicate	One, or several copies of a digital image file made from a master. Different versions of an image file may be considered as originals; for example, variations of images made from the same master or RAW image file. To eliminate duplicates, only preserve the copy which meets the highest image standards required for business purposes (resolution, colour profile, bit-depth). Care should be taken to verify and merge descriptive information across multiple copies, as these may be essential to the interpretation of the image.

High-Risk Images	Images which carry a greater risk of litigation, breach of privacy or copyright, or loss of public trust through their misuse. These include: images of children, marginalised people, equity-deserving groups, images, including images of works of art, owned by corporations or individuals who derive revenue from their licensing and sale, or images of public figures or their performances which have not been licensed for use or specifically purchased or covered in a contract with the City.
Icon	A graphic symbol that represents an entity or action. Icons are graphic representations that help to simplify your message quickly. Icons are commonly used in communications, applications, and design. <i>*Icons are often confused with logos and branding.</i>
Image Administrator	The City staff who have been assigned a user account for lifecycle management and quality control of their Divisional Workspace or their Division's images in the City Share.
Image Cataloguer	The City staff who have been assigned a user account for the cataloguing, upload, and editing of images to their Divisional Workspace or the City Share.
Image Library Client	A Division, section, business unit, or individual that uses the Image Library. Clients can include Image Stewards, Image Cataloguers, and Image Users, or divisional staff who search, download, or commission photography, but are not necessarily the end user.
Image Steward	The City Division that is responsible for the creation, purchase or licensing of images uploaded to the Image Library, and is responsible for their ongoing management, storage, and disposal. The Division Head or their designate is accountable for this management, storage, and disposal.
Image User	The City Division, section, unit, team or group within a City Division, or City Agency or Corporation, that reproduces images from the Image Library for the purpose of publication, distribution, or use.
Notice of Photography	A public notice board which is placed at the entrance of a public function which notifies attendees that they may be photographed and that their image may be reproduced by the City.
Permission Form	A consent form which an individual signs to give the City permission to reproduce images of that individual, or that is signed by the legal guardian of a child to give the City permission to reproduce images of that child. This is often referred to as a " Multimedia Consent Form. "
Preservation	All processes and operations involved in the stabilization and protection of records against damage or deterioration and in the treatment of damaged or deteriorated records to ensure their long-term use. Preservation may also include the transfer of information to another medium to maintain access to the contents of records.

Record	Information, however recorded or stored, whether in printed form, on film, by electronic means or otherwise, and includes documents, financial statements, minutes, accounts, correspondence, memoranda, plans, maps, drawings, photographs, and films.
Retention Schedule	An authority comprising of a description of a body of records, a retention period for those records and a disposition rule stating whether, at the expiry of the retention period, the records are to be destroyed or reviewed for preservation by the City Archives.
Records Classification Code	The alpha numeric codes assigned to specific record types which are cited in Schedule A – Records Retention Schedule, of Chapter 217 of the Toronto Municipal Code.
Transitory Record	A record that meets at least one of the following criteria: <ul style="list-style-type: none"> • Required solely for the completion of a routine action, or the preparation of another record. • Not an integral part of a City Record (for example, a photocopy of a record, or a record filed with other, transitory records). • Not required to meet statutory obligations or to sustain administrative or operational functions.
User Group	A group of staff who share similar software permissions and access restrictions to distinguish their digital images and Image Library tools from others. These are delineated at the City Division level, or in special circumstances at the unit level within a Division.
Visual Media	Digital and printed images, photographs, videos, fine art, signs, typography, drawings, graphic design, illustrations, industrial design, advertising, animation, and electronic resources. Visual media is seen on billboards, smartphones, newspapers, screen projectors, posters, televisions, computers and various other media and devices.