

Information Management Guideline - Electronic Records Disposition

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1 Introduction

1.1 Records and Information Management at the City of Toronto

Records and Information Management at the City of Toronto is the means by which the city plans, creates, captures, organizes, protects, uses, controls, shares, disposes of, and evaluates its information. The practice of records and information management ensures that the value of City information is identified and used to the fullest extent.

City business records must be managed throughout their lifecycle, or retention period, from creation to disposition. A record's retention period is defined by the [City of Toronto Municipal Code, Chapter 217, Schedule A](#).

The City of Toronto has a robust physical records management program to manage and dispose of analog business records. The objective of this guideline is to detail how records management processes are applied to the City's electronic business records, stored in a variety of City locations and applications.

1.2 What is Disposition and why is It Important?

Disposition is the final stage of a business record's lifecycle. It ensures that when records meet the end of their retention period, they are either:

- Destroyed in an appropriate manner.
- Transferred to City of Toronto Archives, or
- Retained, if a legal hold is applied as a result of current or anticipated investigation that suspends the normal disposition or processing of records.

The disposition of business records, regardless of format, is an essential step in maintaining a reliable and effective records management program.

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

- Ensure the City is in compliance with legislative requirements for retention of records.
- Reduce the risk of privacy breaches or inappropriate disclosure of confidential information.
- Avoid unnecessary costs incurred by storing records that are no longer needed.
- Make finding and retrieving information more efficient.
- Streamline the Freedom of Information (FOI) request process when non-relevant information has been disposed of and records can be more easily accessed.

- Ensure corporate records with long term historical or evidential value are retained.

2 Purpose

This Guideline identifies the main processes, roles and responsibilities in the electronic records disposition process so that electronic records can be managed in accordance with [Toronto Municipal Code, Chapter 217, Records Corporate](#) and the [Municipal Freedom of Information and Protection of Privacy Act](#).

3 Application

This guideline applies to all City of Toronto Divisions and City employees, volunteers and contract employees hired by the City of Toronto who may be involved in the disposition process of electronic records.

This guideline does not apply to Elected Officials, Accountability Officers or City Agencies and corporations. The City of Toronto encourages City Agencies and Corporations to review, adopt or update this policy appropriate to their business circumstances.

4 Scope

The considerations in this guideline can be utilized for any application that stores electronic business records (e.g., shared drives, business applications, etc.). System-specific supporting procedures may be required since electronic disposition processes and/or functionalities may differ from system to system.

This guideline does not apply to [transitory records](#), which are records that are produced or received in the course of routine actions, in the preparation of other records which replace them, or for reference. Transitory records can be destroyed without approval when they are no longer useful.

5 Principles of Disposition

The disposition of records is a process based on four fundamental principles that serve as a foundation for a trusted, reliable and repeatable procedure. A documented process, including roles and accountabilities, supports the City if records destruction or transfer to the City of Toronto Archives is called into question through legal proceedings or Freedom of Information (FOI) requests. Therefore, disposition of records in any format should be authorized, timely, secure, and documented.

5.1 Disposition is Authorized

The disposition of records must:

- Be in accordance with an approved records retention and disposition schedule defined in the Toronto Municipal Code, Chapter 217, Schedule A.
- Be triggered by the records having reached the end of their retention period.
- Be approved by the appropriate staff of the Division that owns the records.

5.2 Disposition is Timely

Once records are no longer required to meet legal or administrative needs, they should be disposed of according to the approved records retention and disposition schedule defined in the Toronto Municipal Code, Chapter 217, Schedule A. This disposition process should occur on a regular and consistent basis within City Divisions.

5.3 Disposition is Secure/Confidential

Records should be handled and disposed of with the same level of security and confidentiality that was required to safeguard the records when they were active.

5.4 Disposition is Documented

The disposition of records must be well-documented by City Divisions because the evidence of the destruction or transfer to City of Toronto Archives may be vital in case the disposition is called into question through legal proceedings or Freedom of Information (FOI) requests.

6 Roles and Responsibilities in an Electronic Disposition Process

The electronic disposition process requires the collaboration of Corporate Information Management Services (a business unit inside the City Clerk's Office), Technology Services Division (TSD) and the Divisions that creates the records.

6.1 Corporate Information Management Services (CIMS) will:

- Provide consultation, as required, in the development of Divisional records disposition processes to ensure compliance with this guideline.

Records Services, Archival Services, and individual business units in CIMS, have additional responsibilities:

6.1.1 Records Services (RS) will:

- Maintain an up-to-date and publicly accessible records retention schedule, defined in Toronto Municipal Code, Chapter 217, Schedule A.
- Provide training and education that increases awareness and knowledge of records lifecycle management and disposition requirements.
- Facilitate, as required, the development of records classifications and their respective retention schedules.
- Receive and maintain copies of disposition documentation.

6.1.2 Archival Services (AS) will:

- Determine which records warrant continued preservation as archival records. Such determinations will form the disposition rule in the retention schedule (City of Toronto Municipal Code, Chapter 217, Schedule A).
- Accept and coordinate, as required, the transfer of electronic records with potential archival value into the custody of Archival Services.

6.2 Chief Technology Officer (Technology Service Division) will:

- Enable the technology to support:
 - Secure and comprehensive destruction of electronic records.
 - A corporate digital preservation repository.
 - Transfer/migration of electronic records with archival value from City Divisions to Archival Services.
 - Integration of electronic disposition requirements into technology architectures.

6.3 Division Heads will:

- Ensure electronic information and its metadata within their Division are managed throughout their lifecycle, from creation or collection to disposition.
- Ensure compliance with this guideline and related records disposition procedures and requirements within their Division.
- Ensure employees are properly trained to increase their awareness and knowledge about records disposition.
- Ensure the appropriate and timely implementation of electronic disposition processes within their Division.
- Identify the staff within their Division who will:
 - Initiate the electronic disposition process and coordinate with CIMS.
 - Identify and classify electronic records ready for disposition.
 - Authorize and execute the destruction of electronic records and/or the transfer of records to the City of Toronto Archives during the disposition process.
 - Communicate application of records holds and their expiration.
 - Save the documentation related to disposition to respond to potential legal proceedings or Freedom of Information (FOI) request needs.

6.4 Division Staff will:

- Manage and maintain electronic records through their lifecycle, only destroying them in accordance with the process outlined in this disposition guideline.
- Dispose of transitory electronic records as appropriate

7 Information Management & Disposition by Design

As defined in the Introduction, disposition is the final stage of a business record's lifecycle and an essential step in maintaining a reliable and effective Information Management (IM) program. In complex organizations like the City of Toronto, it is important that IM is built into technology by design so that recordkeeping, legislative, and policy requirements are consistently applied across different systems.

The following project deliverables will ensure IM is embedded into the design of a technology and enable disposition activities:

- Integrating business systems and applications with the City's recordkeeping repositories.
- Automating disposition workflows within systems and repositories.
- Developing records import and export plans.
- Creating custom system roles and responsibilities to support the disposition process.

CIMS offers information management assessments to proactively identify IM risks for systems and services and suggest mitigations, which are then built into new systems and/or business processes. Divisions are encouraged to request an information management assessment when starting:

- Technology procurements submitted through the Cloud Architecture Review Board (CARB) and the Enterprise Architecture Review Board (EARB).
- Upgrades to existing technologies that manage records such as moving from shared drives to SharePoint or another document repository.
- Changes in business process from paper to digital service delivery.
- Physical record digitization projects as per the digitization of paper records or photographs.
- System decommissioning projects to retire legacy applications that may store City Records.

8 High Level Phases in an Electronic Disposition

8.1 Identification of Divisional Employees Responsible for Disposition

Electronic disposition is initiated by Divisions because electronic records are kept in systems and applications that are usually managed and accessed only by their staff (e.g. shared drive, SharePoint sites, business applications, and T-Recs workspaces). For this reason, it is recommended that all Divisions have one or more employees responsible for:

- Understanding Divisional records and disposition processes.

- Initiating the disposition process for electronic records.
- Creating and reviewing the electronic disposition report as needed.
- Communicating and coordinating disposition with the Records Services unit.
- Having knowledge of records holds and their expiration.
- Authorizing and executing the destruction of records and/or the transfer of records to the City of Toronto Archives during the disposition process.
- Saving the disposition documentation as defined by [phase 8.6](#).

8.2 Identification of Electronic Records Ready for Disposition

Dispositionable records are business records that have concluded their retention period. This means that both their active time (when a record is regularly used by the Division) and their inactive time (when the record is no longer required for current business but must remain accessible for a certain time due to administrative, fiscal, or legal requirements) are complete. Retention periods for the City of Toronto are defined by the records retention schedules in the [City of Toronto Municipal Code, Chapter 217, Schedule A](#).

Below are two examples of records retention schedules with their retentions periods (A = active and I = inactive time) and their disposition action.

Code	Records Title	Originating Office	Retention				Comments/Legislation
			A	I	Total	Disposition	
I0161	Meetings and Committees Records relating to meetings and committees of City staff that are not related to City governance issues. May include regular or interim meetings held with external and internal client groups or individuals. Documents may include meeting agendas, minutes of meetings, and committee reports.	Common	C+1	4	C+6	D	
I0186	Speeches, Presentations, Receptions and Awards Ceremonies Records relating to the preparation, delivery, and performance protocol for speeches, presentations, receptions, and awards ceremonies hosted by the City. These events may include employee recognitions, inaugurations, and centennial events. Includes speech notes, formal addresses, and arrangement correspondence and memoranda.	Common	C+1	5	C+6	AR	

Note: These are two records retention schedules found in the City of Toronto Municipal Code, Chapter 217, Schedule A. I0161 has as disposition action: DESTROY (D); I0186 has as disposition action: send to City of Toronto Archives for ARCHIVAL REVIEW (AR). Both have a retention period of 7 years.

During the active and inactive phases, Divisions need to map the records to their appropriate records retention schedule so that a retention period is properly assigned.

Usually, if records are organized according to a file plan, (a structure that serves as the foundation for managing, classifying and organizing records, based on the business

activities and their retention and disposition requirements), it may be possible for the system or authorized staff to analyze the content and obtain the information required.

If records are not organized according to a file plan, after the extraction of the records, an inventory must be created to map them to relevant retention schedules to ensure that records have fulfilled their retention criteria.

Divisions can consult with CIMS at infomgmt@toronto.ca for assistance in how to create or extract an inventory, develop a file plan, and how to map the records to a retention schedule.

8.3 Creation of Electronic Disposition Report

Once all electronic records eligible for disposition have been identified, a report should be created or generated. Divisions should consult with Records Services on what fields are required in the report. This phase may often be completed concurrently with 8.2.

If disposition requirements have been embedded in the application, it could be possible to:

- Support the creation of a report template with the required fields to validate the accuracy of the information and that can be modified if needed.
- Set a schedule for regular report generation (i.e., weekly, bi-weekly, monthly, quarterly, bi-annually, or annually).
- Automatically generate the report according to that schedule.
- Automatically send a notification to the responsible party once the report is generated.

If automation is not possible, the report can be created by exporting the information from the system.

An electronic disposition report should contain at least the following fields:

Field	Description
System	Name of the system or application where the electronic records are stored (e.g., T-Recs, SharePoint, Shared drives.)
Title	The name or title the record that should describe its purpose or “business” and distinguish the document from all others
Unique identifier	System generated or manually created identifier that marks that particular record as unique from every other record. For example, a case number.
Retention code & Title	Code assigned to a retention period and title of the retention period.

Records dates (Start-End)	Start and end or closure date of the record.
Records size and format	Format and size of the records
Records Custodian	Division or Business Unit who created or is responsible for the records in the disposition report.
Location (if applicable)	Location of the records or information on the City's server. This may include server name, file path, or other such information that identifies where this information can be found in City electronic infrastructure

8.4 Validation of the Electronic Disposition Report

When the report is generated, the notification is sent to the responsible party(ies), to review and to validate content accuracy. The validation process is a collaboration between the Division and Records Services to clarify any outstanding questions. The main steps are:

1. The Division will review the report and validate the content, ensuring that:
 - a) All the fields are completed;
 - b) There are no active records;
 - c) There are no records under hold.

Following this, the Division consults CIMS, by sending the report to infomgmt@toronto.ca and clarifying in the subject line: YYYY Disposition Report for Division XXX, Business Unit YYYY"

2. CIMS Records Services will:
 - a) Review the report and advice of any issues.
 - b) Send the report to CIMS Archival Services to confirm if any records up for disposition require archival review.
 - c) Send all consolidated feedback back to the Division.
3. Finally, Division will review the feedback, approve the content for disposition, and communicate the approval to CIMS.

The approval of the content for disposition means that the disposition actions of destruction and/or transfer to the City of Toronto Archives can be executed.

8.5 Execution of the Electronic Disposition Actions

8.5.1 Electronic Destruction

Once the disposition package has been reviewed and approved, the Division can delete the records identified for destruction in the system.

Based on how the system is set up or where the records are located there may be the need for TSD or Divisional IT to ensure that technologies are capable for executing

proper destruction, and that a certification or log of destruction is produced as evidence of the completed destruction.

8.5.2 Transfer to City of Toronto Archives

City records that have been identified for transfer to the City of Toronto Archives can be transferred, provided their disposition has been approved and that secure transfer, with appropriate documentation, is in place. The ownership of the transferred records will change from the Division to Archival Services.

TSD or Divisional IT may need to support to ensure that technology is enabled to maintain record integrity during transfer and that a certificate or log is produced as evidence of the completed transfer.

8.6 Saving Documentation of Electronic Disposition

Both the City Division and Corporate Information Management Services (CIMS) should save and maintain a copy of the disposition documentation.

Disposition documentation is information related to the destruction of records, or their transfer to the City of Toronto Archives. It includes, but it is not limited to, detailed lists of records eligible for disposition, destruction certificates or destruction logs, and confirmations of transfer to City of Toronto Archives

It is important to maintain this documentation to respond to potential legal proceedings or Freedom of Information (FOI) request needs.

Disposition documentation must be preserved for 100 years according to The City of Toronto Municipal Code, Chapter 217, Schedule A, code I0253.

9 Authorities

- City of Toronto. (2021). [Toronto Municipal Code Chapter 217, Records, Corporate \(City\)](#)
- City of Toronto, City Clerk's Office. (2021). [Digital Preservation Policy](#)
- City of Toronto, City Clerk's Office. (2019). [Disposition Authority 2019. Destruction of Source Records following Digitization](#)
- City of Toronto, City Clerk's Office. (2018). [Acquisition Policy for the City of Toronto Archives](#)
- City of Toronto, City Clerk's Office. (2018). [Information Management Accountability Policy](#)
- Government of Ontario. (2004). [Personal Health Information Protection Act, 2004](#)
- Government of Ontario, City of Toronto. (1990). [Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990](#)

10 Contact

For assistance regarding disposition, contact infomgmt@toronto.ca.

11 Guideline Approval

Approval provided by Kristie Pratt, Deputy City Clerk, effective February 23, 2023.

12 Guideline Review

The City Clerk's Office will review this Policy two years after the effective date of this Guideline, or earlier if warranted.

Appendix

Appendix A: Definitions

Archival Review: final action completed during the disposition process to determine whether a record has potential long term archival value. It is completed by the Archival Services.

Archival Record: a record that is designated as such by the City Archivist and warrants continued preservation; these include City records that have reached the end of their retention period, and must be kept for legal or financial reasons, or have been determined to have historical and/or scholarly significance for researchers.

Archival Value: the evidential value and informational value of records, which are determined during appraisal, and justify their preservation as archival records.

Approver: the role responsible for authorizing disposition of all records of the division. It is usually the head of the division or a delegate.

Authenticity: an authentic record is one that can be proven to be what purports to be is.

Business Record: recorded information created, received, and maintained as evidence, and as an asset by the City, in pursuit of legal obligations, or in the transaction of business.

Certificate of Destruction Formal document provided as a proof that paper or electronic records, hard drives and other media assets have been destroyed in compliance with the legal requirements.

Destruction: final action completed during the disposition process to eliminate or delete records and their related metadata beyond any possible reconstruction.

Disposition: the actions taken with regard to inactive City records as determined by an appraisal pursuant to legislation, regulation, or administrative procedure. Actions include destruction, designation as archival records, or as designation as permanent records.

Disposition Report: a list of the records that are identified as ready for disposition. It contains key information that will help to identify the status of the records if requested in the future.

Electronic Record: recorded information created, received and maintained as evidence, and as an asset by the City, in pursuit of legal obligations, or in the transaction of business that has been captured and stored in an automated system and that requires the use of the system to render it intelligible by a person.

Inactive Record: refers to a record that is no longer required to conduct the current business of their creator but must remain the responsibility of their creator due to administrative, fiscal, or legal requirements.

Integrity: a record that is complete and unaltered. Any authorized annotation, addition or deletion to a record should be explicitly indicated and traceable.

Information Management Lifecycle: model of records management and archival science that characterizes the life span of a record as comprising sequential stages: creation or receipt; classification; maintenance and use; disposition through destruction or transfer to an archival institution or agency; description in archival finding aids; preservation; reference and use.

Record Hold: a restriction on a record that exists as a result of current or anticipated litigation, audit, government investigation or other such matter that suspends the normal disposition or processing of records.

Reliability: a record whose contents can be trusted as a full and accurate representation of the transactions or activities to which they attest and can be depended upon in the course of subsequent transactions or activities.

Records Owner: the Division or Business Unit that creates the records and must ensure that records are retained for the full duration of their retention period and that disposition occurs as scheduled.

Retention Period: the retention rule stating how long a record must be retained or kept by the City.

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 preserved by the City Archives.

Retention Trigger: An event or occurrence that dictates the starting of the retention of a record. It may be based on:

- A time period, e.g., the end of the year,
- An event, e.g., the complaint is resolved,
- The record is superseded by a newer version.

Transitory Records: records in any format that are of short-term value. Required solely for the completion of a routine action or the preparation of another record. Not required to meet statutory obligations or to sustain administrative or operational functions.

Appendix B: Electronic Disposition Checklist

During the periodical disposition of electronic records, Divisions should:

- ☒ Identify electronic records ready for disposition.
- ☒ Create or administer electronic disposition report.
- ☒ Have manager or appropriate staff review electronic disposition report.
- ☒ Correct any issues found in the electronic disposition report.
- ☒ Send electronic disposition report to Records Services at infomgmt@toronto.ca.
- ☒ Review feedback on the electronic disposition report provided by Records Services.
- ☒ Approve electronic records disposition report and send the confirmation of approval to Records Services infomgmt@toronto.ca.
- ☒ Complete destruction in the system of the electronic records and/or contact Technology Services Division or Divisional IT if needed.
- ☒ Receive and save the certification of destruction and send a copy to Records Services at infomgmt@toronto.ca.
- ☒ Transfer electronic records for archival review to the City of Toronto Archives and/or contact Technology Services Division or Divisional IT if needed.
- ☒ Save confirmation of transfer to City of Toronto Archives and send a copy to Records Services infomgmt@toronto.ca
- ☒ Save all the documentation related to the electronic disposition activity.