Guideline
Records Management for Physical Records

Program Impacted	Strategy & Business *The City of Edmonton's corporate processes are robust and helpful for integrated service delivery.* Technology & Data *The City of Edmonton's technology and data are leveraged to enable quality decision-making and enhance innovative service delivery.*
Approved By	Aileen Giesbrecht, City Clerk
Date of Approval	March 18, 2025
Approval History	N/A
Next Scheduled Review	March 2027

Guideline Statement

This guideline provides direction to employees on corporate records and information management, including specific guidance on how, when and why to keep, dispose or archive physical City records and information in a compliant and secure manner.

This guideline falls under the Lifecycle Management (LM) functional domain, as defined in *A1477 Data and Information Management Administrative Policy.*

Scope

This guideline provides direction for all City employees, contractors and volunteers who create, receive, access or use records in any physical format, including digital records stored on physical mediums. Employee records management roles and responsibilities are outlined in the Corporate Records and Information Management Accountability Model (RASCI.)

Guideline Specification

City employees, contractors and volunteers who create, receive, access or use records in any physical format are responsible for managing them.

Although there has been a significant push to go digital in the past couple of decades, there are still times when the City needs to keep physical records for one or more of the following reasons:

- *Legislation*: Federal and provincial laws say that some types of records need to be kept in a physical format and managed that way. Example record types include election ballots and contracts that require wet-ink signatures, such as records that create or transfer interests in land.
- *Preservation:* Paper records are still the only format guaranteed to be readable for long periods of time. Some records must be kept by the City for 25 years or longer, and some need to be kept permanently without alteration; for example, Council meeting records have a permanent retention. The complete meeting file is printed on archival paper, filed and stored permanently.
- *Process-driven considerations:* Sometimes it makes business sense to keep a record in a physical format. For example, digitization isn't practical for some paper records. It might be too expensive or take too much digital storage space to scan and store oversized records like old building blueprints.

Definitions

Centralized filing system refers to the files of one or more business units stored in one location to improve management, access and control.

Certificate of destruction refers to a document confirming the secure destruction of specific records in conformity with City of Edmonton Classification and Retention Schedule. A certificate of destruction must be completed whenever official copies of the City's records are destroyed. The certificate provides information about the records that were destroyed, including but not limited to:

- certificate number
- file names or other description
- retention rules
- dates covered by the records
- destruction method

City of Edmonton Classification and Retention Schedule refers to a living policy document that categorizes records based on similar use and purpose to facilitate lifecycle management. The schedule provides rules that identify the length of time a record needs to be kept (retention period), what to do with the record when it is no longer needed (disposition method) and supplementary information.

City record refers to recorded information in any form that is acquired or developed during the course of City business.

Corporate Records Centre (CRC) refers to the off-site secure storage facility managed by the Corporate Records and Information Management team within the Office of the City Clerk that provides for the transfer, processing, storage, retrieval and secure destruction or transfer of physical City records.

Non-transitory records refers to City records and information that demonstrates the City's activities, business transactions and decisions. There are many different types of non-transitory records, each with specific rules about how long they need to be kept (retention period) and whether to destroy them or transfer them to archives (disposition). These rules are outlined in the City of Edmonton Classification and Retention Schedule.

Physical record refers to information recorded in a physical format, such as paper, microfilm, sound recordings, videotapes, x-rays, microfiche, aperture cards, or photographs. Physical mediums that contain digital City information are considered physical records. Mediums include hard drives, USB drives, disks, SD cards, magnetic tapes and audiovisual media such as CDs and DVDs.

Records lifecycle refers to the life span of a record from its creation or receipt to its final disposition. There are four stages:
1. *creation or receipt:* The initial receipt or creation of City records, including naming, drafting and formatting.
2. *access and use*: The classifying, filing, accessing and sharing of records and information.
3. *storage and maintenance:* The maintenance and storage of records for the legal and operational time period required (retention period) in the correct locations with the correct access.
4. *destruction or transfer:* The final outcome of a record's lifecycle, referred to as disposition. A record is due for disposition when it has met its retention period requirements as defined by the City of Edmonton Classification and Retention Schedule. Disposition could be the destruction of the record or a transfer of record ownership to another entity.

Transitory records refers to City records and information that may be required for a limited period of time for the completion of a routine action or the preparation of a corporate record but not required to meet statutory obligation or to sustain administrative or operational functions. Transitory records only possess an immediate value and should be disposed of thereafter.

Physical Record Types

Physical records come in many formats, some more official than others. Information can be recorded on paper, microfilm or microfiche, CDs, DVDs, videotapes, photographs, sticky notes, data tapes, hard drives and notepads, among many others. If information is written or recorded on something you can touch, it's a physical record.

Filing Requirements by Frequency of Use

Record storage requirements depend on how often a record is used; frequently used records are stored onsite, while less commonly referenced records should be stored offsite. The most cost-effective storage location for most physical records is at the City's offsite corporate records storage facility, the Corporate Records Centre (CRC), where the City is also able to manage the full lifecycle of the records correctly — see Table 1. Records stored offsite can be delivered to the business area location upon request.

Table 1: City Records and Information - Frequency of Use and Recommended Storage Location

Term	Frequency of Use	Storage Location
Active	used on a regular basis	stored onsite so records are easily accessible to the appropriate user(s)
Semi-active	used occasionally but are not required for immediate access	stored at the Corporate Records Centre until records have reached the end of their retention period
Inactive	no longer accessed or used to conduct current business	stored at the Corporate Records Centre until records have reached the end of their retention period

Filing Requirements by Security Classification

Physical records with different security classifications have different filing requirements (see Table 3). Security classifications provide a way to organize data and information so that they are available only to the right people in the right roles. All City records and information must be assigned a security classification, as per the City of Edmonton Classification and Retention Schedule.

Table 3: Physical Filing Requirements by Security Classification

Security Classification	Filing Requirements
Public	Physical public documents with current information may be stored in the most convenient location. Out-of-date transitory documents should be placed in a grey shred bin.

Security Classification	Filing Requirements
Internal	Files are stored in a location that is accessible to City employees but not accessible to the general public, such as a shelving unit in a staff-only area.
Confidential	Files are stored in a locked file cabinet or room when not in use.
Restricted	Files are stored in a locked file cabinet or room when not in use. The only keyholders are those who also have permission to access those documents.

Filing Requirements by Transitory/Non-transitory Classification

Physical records, like digital records, are primarily classified as either transitory or non-transitory. Transitory records are temporary informal records. Employees need transitory information for only a short period of time, often for reference. Transitory records may help employees to complete routine actions or prepare non-transitory records. They do not need to be kept for legal reasons or to support ongoing work. Transitory physical records can include rough notes, copies, drafts, working materials and reference materials.

Non-transitory records record activities, transactions and decisions made by City employees; they contain information that needs to be kept and managed. Non-transitory record types need to be kept for a set period of time for legal reasons or to support ongoing work. Non-transitory records can include receipts, permits, licenses, applications and completed forms.

Non-transitory Active Records

If non-transitory records are in regular use, they are considered active records and are kept onsite. Each business area that creates or receives physical records should have an area where they can securely store records in a central location, using a standardized business area filing system. Examples of different types of filing systems are listed in Table 2.

Table 2: Physical Record Filing Systems

Physical Record Filing Systems	
Alphabetic	Records are named using full words or individual letters. Names may include project names or geographic locations. Records are sorted, shelved or boxed in alphabetical order to be retrieved easily.
Alphanumeric	Records are named using a combination of letters and numbers. Names may include company name, subject or geographic location, as well as date or chronological number. Records are sorted, shelved or boxed in alphabetical order or ascending numeric value for retrieval, depending on whether the record name begins with a number or a letter.

Physical Record Filing Systems

Functional	Records are classified based on the high-level work functions such as human resources or financial management. A second and third level of classification may also be used, with the second level representing activities carried out under each function, and the third level representing the types of records or transactions (records series) that are generated as part of each activity.
Numeric	Records arranged by number. The number can be part of the record itself, such as an invoice number, or it can be assigned, like a file number.
Subject	Records classified by specific subject matter and arranged in alphabetical order by subject. This is the system usually found in libraries, with subject titles such as Psychology or Woodworking.

Non-transitory Semi-active and Inactive Records

The City's physical records are stored offsite at the Corporate Records Centre (CRC) once they are no longer actively being used. Business areas work with their Department Records Advisors (DRAs) to prepare an inventory, box records for pick up and transfer semi-active and inactive physical records to the CRC. Once CRC staff receive a records transfer request, they pick up the boxes. The inventory is entered into a records management software application that manages the lifecycle, storage location and requests associated with physical records. City departments can request delivery of their semi-active and inactive records when needed and must return them when they are no longer regularly in use.

Non-transitory Record Disposition

Disposition is the action taken after City records and information have reached the end of their retention period, a length of time the City needs to retain records based on business, legal, and historical requirements. The retention period for each record series is identified in the City of Edmonton Classification and Retention Schedule. Disposition is the last stage of a record's lifecycle.

City records and information in the custody and control of City staff, contractors and volunteers must be disposed of defensibly once they have been kept for the required time. Arbitrary and unplanned records destruction is considered to be suspicious activity, especially if the information is needed for an information request or litigation. Records destruction can be found by courts to be illegal destruction of evidence, which may bring serious legal sanctions against the organization, including court fines.

To avoid these consequences, the City has developed and implemented a program that will ensure compliance with legislation and operational needs while providing a secure and safe method for the disposition of records and information.

Disposition Roles and Responsibilities

Records management roles and responsibilities are listed in the *Corporate Records and Information Accountability Model (RASCI).* The City Clerk or delegate must authorize all records dispositions, and only the Corporate Records Centre is allowed to destroy non-transitory physical records.

Methods of Disposition

Each record series in the City of Edmonton Classification and Retention Schedule is assigned a disposition outcome: destruction, archives or permanent. On rare occasions, the City will also transfer ownership of City records to another entity, such as when Drainage Operations moved to Epcor.

Destruction

Records must be destroyed using a method appropriate for their medium and content. Sensitive or confidential information must be rendered unreadable. The method used for records destruction must also be cost-effective and environmentally friendly.

The Corporate Records Centre is responsible for destroying physical records, as well as physical mediums that store digital records.

Methods of destruction:

Paper records are shredded to a high-security particle size, compliant with the DIN 66399 P-3 standard, by a NAID AAA-certified vendor. Shredding is conducted under surveillance at the Corporate Records Centre. Shredded material may be recycled or pulped.

In most cases, sanitization is recommended to remove sensitive information from physical devices storing digital records. Methods include:
- Destroying the medium by shredding, pulverizing and incinerating when the storage device is no longer required by the business area. Destruction is conducted on-site at the Corporate Records Centre using an authorized contracted shredding services.
- Purging accomplished via degaussing or secure erasing of a hard drive. Degaussing magnetically erases digital information from tape devices and hard drives but is not effective in clearing data from DVDs and CDs.

Archives

Records and information are transferred to the City of Edmonton Archives when the primary corporate value has expired but the record maintains historical value, as identified in the City of Edmonton Classification and Retention Schedule. Custody is transferred through the physical transfer of records and a certificate of transfer from the CRC.

Although these records are now in the custody and control of the City of Edmonton Archives, they may still be accessed by City staff as required, either by viewing onsite at the City Archives or reproduced in an appropriate format. The City of Edmonton Archives may choose to preserve the entire transferred collection or retain a sample selection.

Permanent

Permanent records must be retained indefinitely at the CRC. Continued preservation is required to comply with legislation or to support ongoing City operational requirements. Examples of permanent records are the Corporate General Ledger, as required by the Income Tax Regulation, and Building and Development Permits, as required for operations to immediately issue compliance certificates.

Transfer to Another Entity

Records may need to be transferred to a third-party entity if the City transfers ownership of a program or service to another provider. Transfers still must undergo the proper disposition process, resulting in the required appropriate documentation.   For example, before drainage records were transferred to EPCOR, they received sign off by the appropriate delegated authority.

Calculating Disposition

Disposition is identified using the following formula:

Date of Retention Trigger + Length of Retention Period = Disposition Date

Find the retention trigger and retention period in the *City of Edmonton Classification and Retention Schedule*.

Example:

Date of Document:	July 15, 2010
Retention Trigger:	Current year (end of year) = Dec 31, 2010
Retention Period:	2 years

Retention Trigger	+	Retention Period	=	Disposition Date
December 31, 2010	+	2 years	=	December 31, 2012

Suspending Disposition

Records and information on hold need to have disposition suspended, even if they have reached their disposition date. The Department Records Advisor will determine if any of the listed records on a Notice of Disposition has an associated hold. See Table 4 for types of holds.

Table 4: Types of Holds

Type of Hold	Definition
Legal	Legal holds suspend disposition of records related to current or pending litigation. Legal Services or the Corporate Records and Information Management team within the Office of the City Clerk contacts business areas and DRAs to advise them of legal holds.
Information request	Information request holds suspend disposition of information requested under the provincial protection of privacy and access to information acts.
Audit	Audit holds suspend disposition of information relating to a current or pending audit. Corporate Records will contact DRAs to advise them of audits.
Schedule revision	Schedule revision holds suspend disposition for records included in records series that are under review.

Notice of Disposition

A Notice of Disposition must be prepared and retained when City records and information are destroyed. This provides documentation proving compliance with legislation and with the City of Edmonton Classification and Retention Schedule. Branch Managers or delegate are responsible for signing off that the business area's record advisor has no concerns with the records disposition; the City Clerk or delegate signs to authorize the disposition.

A Notice of Disposition provides information about the records that were destroyed, including:
- record filing names
- retention rules and information
- record date range
- dates the records were approved to be destroyed
- destruction method

A Notice of Disposition becomes a Certificate of Destruction once all parties have reviewed and signed the notice and the destruction or transfer of records has been completed.

Copies of the Notice of Disposition and Certificate of Destruction will be processed as follows:
1. The Certificate Number is applied to the Notice of Disposition by CRC staff.

2. The records are updated as destroyed in the records management software and the certificate number added.
3. A paper copy of the Notice of Disposition and the corresponding Records Transfer are filed at CRC.
4. The completed Certificate of Destruction is shared with the DRA.

A Notice of Disposition and Certificate of Destruction prove compliance with legislation and with the City of Edmonton Classification and Retention Schedule. Certificates of Destruction may be referred to and must be produced as evidence when requested by a court of law.

Transitory Record Disposition

A transitory record is a City record that may be required for a limited period of time for the completion of a routine action or preparation of a corporate record, but is not required to meet statutory obligations or to sustain administrative or operational functions. Examples of transitory records include:
- copies
- drafts
- working materials
- informal to-do lists and reminders

Temporary Use

Transitory records have no further value or usefulness beyond an immediate or short-term use. They should not be retained after that time. City employees are responsible for the routine destruction of transitory records.

Secure Shredding

City transitory records must be collected via secure grey shred bins. Transitory records may contain sensitive, confidential or personal information. They are a liability to the City of Edmonton and must be disposed of in a secure manner. Employees are responsible for using the grey bins for transitory records. Corporate Records Centre staff are responsible for secure destruction of these records.

Bins should be located in a convenient area within the business unit for all staff to use and be readily accessible for removal and replacement by Corporate Records Centre staff. Bins should not be moved from this location without notifying the Department Records Advisor or Key Coordinator.

If locked bins are not available, employees may place transitory City records to be shredded in boxes labelled *Security Shred - CRC* and store them in a locked room. When a business area has filled four or five boxes, an employee should call the CRC for pick-up.

When a grey bin is 80% full, an employee can request that a bin be picked up; CRC staff will replace the bin within a week. Pick up requests must include the location and number of bins and should be directed to the Corporate Records Centre. See OneCity for contact information.

References and Supporting Resources

- [Administrative Policy A1477: Data and Information Management](#)
- [City of Edmonton Classification and Retention Schedule](#)
- [Corporate Information Management Glossary of Terms](#)
- [Corporate Records and Information Management Accountability Model (RASCI)](#)