

# Guideline

## Records Management in Google

<b>Program Impacted</b>	Strategy & Business <i>The City of Edmonton's corporate processes are robust and helpful for integrated service delivery.</i>  Technology & Data <i>The City of Edmonton's technology and data are leveraged to enable quality decision-making and enhance innovative service delivery.</i>
<b>Approved By</b>	City Clerk
<b>Date of Approval</b>	March 18, 2025
<b>Approval History</b>	N/A
<b>Next Scheduled Review</b>	March 2026

### Guideline Statement

This guideline provides direction for managing records in Google Workspace It enables the City to meet its operational, legal, regulatory, environmental, historical and financial requirements. Following the provided recommendations allow employees to manage their records in compliance with these requirements by making sure:

- the correct people who need access for their work have the correct records access
- those who do not need access don't have access
- information is kept for as long as it is required but not longer
- a documented records disposition (final record outcome) process is used and authorized by the City Clerk or delegate

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

## Scope

This guideline informs all City of Edmonton employees, contractors and volunteers. Branch Managers are accountable for records management in their business areas, including the management of records in Google, as per the Corporate Records and Information Management Accountability Model (RASCI).

## Definitions

A *certificate of destruction* is a document confirming the secure destruction of specific records in conformity with the 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* is 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.

*Digital record* refers to City information that is entered, created, manipulated and/or stored on digital media or storage devices. This includes:

- records that are born digital (that is, records that are created and saved digitally, like online forms or digital photos)
- digitized records (for example, records that have been converted from a non-digital format, such as scanned paper records)
- unstructured data (for example, Google documents)
- structured data maintained within digital systems (for example, tables within a database)

*Non-transitory records* refers to records that demonstrate the City's activities, 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.

*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.

*Records classification* refers to the systematic process of categorizing and organizing documents based on their content, value, sensitivity and legal or regulatory requirements which enables efficient storage, retrieval, and disposition while ensuring compliance and minimizing risks.

*Transitory records* refer 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.

### **Guideline Specification**

Information is a valuable asset. It helps the City make evidence-based decisions, allows business areas to run smoothly and supports leadership in making sure business areas have what they need to function. Managing City records carefully for the entire time they are in existence allows the City to face less risk and meet legal requirements for record-keeping.

Good records management practices also have the following benefits:

- Reduced staff frustration and increased efficiency - records and information can be found quickly and easily
- Information you can count on - authenticity for information essential to City operations
- Reduced carbon footprint - less storage is needed, therefore less electricity is expended
- Better use of staff time - records and information do not have to be found or recreated as often

## Records Management in Google

The City of Edmonton uses Google Workplace applications to create, share and store many types of City records. Each Google account type and Workspace app has its own records management considerations to be aware of.

### Google Account Types

Records management practices are determined by what type of Google account you're using to manage City records. Both individual employee Google account and business shared account (BSA) types have unique access requirements and best-fit uses. See Table 1 for a comparison.

Table 1: Google account type comparison

	Individual Employee Account	Business Shared Account (BSA)
Owner	Individual employee	Business area
Access to Google Workspace applications, like Google Drive, Gmail and Chat	Yes	Yes
Password access	Individual employee	Primary business area contact
Delegated access	If required*	Often**
For temporary working documents	Yes	No
Suitable for long-term record storage	No	Yes

\* For example, a leader might delegate access to an administrative professional.

\*\* For large team email accounts only. For example, a whole team might manage an email account or provide coverage for those who do. BSAs used for records storage should use delegated access for email monitoring, thereby reducing the amount of staff who have password access to the Drive application.



### **Google Groups are not a type of Google Account.**

They are curated lists of individual and BSA email addresses that can be used as email distribution lists and for group Google Drive access management.

### *Google Drive*

Google Drive is a Google Workplace application that allows users to create and store records. Records are cloud-based, so users can access those same records from different desktop computers, laptops, tablets and smartphones.

Google Drive provides users with access to the following file locations:

- My Drive
- Shared Drives
- Folder structures and files shared with the user but owned by other Google Workspace accounts

### *My Drive*

Every individual account has a My Drive. City records created and stored in a user's My Drive are not accessible to anyone else unless the user changes the sharing settings to include others or moves a record to a shared location, such as the business area's folder structure or a shared drive.

Employee My Drives should own transitory records only - records that possess an immediate value, but do not need to be kept to document a decision, activity or transaction. The business area folder structure should be used for non-transitory records - records that document a business decision, activity or transaction and therefore need to be kept and managed.

Employees should schedule regular reviews of their My Drives to:

- delete transitory records that no longer have any value
- move non-transitory records into the appropriate shared location owned by the business area
- delete personal records that are not work-related or move to their personal accounts

### *Shared Drives*

Shared Drives (formerly known as Team Drives) allow teams to collaborate on Google Docs, Slides and Sheets. A Shared Drive can be created by any individual or team and shared with a larger group.

Google Shared Drives can be helpful for:

- Collaborating on a project or initiative where all the records have the same retention rule (see The City of Edmonton Classification and Retention Schedule)
- Managing transitory documents that should be seen by everyone on the team, like sign-ups for informal team-building activities like potlucks.

### *Business Shared Account (BSA) Google Drive*

BSA Google Drives can host folder structures and own records for their respective business areas, including records with different retention rules. This enables the business area to properly manage record access, record retention and disposition schedules. When BSA Google Drives own all business area non-transitory records, there are fewer access issues during onboarding and offboarding and an unbroken chain of ownership and authenticity is established. It is recommended that business areas have a separate BSA to be used for records management and storage only.

### *Shared Business Area Folder Structures*

All City business areas should have a Google Drive folder structure where staff save City records in a consistent manner. This provides a central location for all employees in a business area to create, view, edit, share and store City records in the Google environment.

Google Drive folder structures mirror the City of Edmonton Classification and Retention Schedule; this method enables the corporation to manage millions of records using a semi-automated process. The top level of folders are labelled after the *functions* in the CoE Classification and Retention Schedule; functions are high-level categories, like Financial Management, Corporate Security and Human Resource Management. This level includes a combination of *common* record types that most business areas use and *core* record types that reflect a business area's unique work. The next level of folders corresponds to the CoE Classification and Retention Schedule *record series*, or sub-categories that group records together based on a similar work purpose, like budgets, security administration, and labour relations. Retention and disposition rules are applied at the record series level. Under those folders, a business area creates folders that make sense for how their business area works.

Access to records in a BSA folder structure is managed using Google Groups for access at the folder and record levels. This method ensures that staff can access records required to perform their job functions while reducing the risk of information breaches and unauthorized access. It also means that when employees are onboarded or offboarded, they just need to be added or removed from the Google Group to gain or lose folder and record access.

For ease of access, employees should add a BSA folder structure shortcut to their My Drives.

### *Managing file and folder access*

Google Drive offers several sharing and general access options. Choose the most limited settings that will meet your business needs. Unless the record has a security classification of Public or Internal, the General Access setting should be Restricted. See Tables 2 and 3.

Table 2: Google sharing settings

Sharing Setting	Action Permitted
Edit	Others can make changes and share the record.
Comment	Others can view and comment on a record but not make changes.
View	Others can open a record but not change it or comment.

Table 3: Google general access settings

General Access Setting	Action Permitted
Anyone with the link	Anyone who has obtained access to the URL, by any means, can now access the record. Staff can allow view, comment or edit access.
City of Edmonton	All employees at the City of Edmonton have access to this record. Staff can allow view, comment or edit access.
Restricted	Only people you share the record with can access the record. Staff can allow view, comment or edit access.



**Sharing confidential or restricted information?**

Add a sharing expiration date to automatically remove user or Group access after a specific date.



**Avoid accidental sharing.**

Any record or folder created inside an existing folder automatically inherits permissions from the parent folder. Check every new record or folder to ensure the correct sharing settings.

*Google Groups*

Google Groups are curated lists of individual and BSA email addresses that can be used for managing BSA or Shared Drive records access. Business areas are responsible for updating their Google Groups, including adding staff during onboarding and removing staff who leave the City or are transferred to another business area.

Google Groups make onboarding, offboarding and staff moves much more manageable by:

- simplifying information gathering by providing one place to find group membership and individual access

- simplifying updates to records access by enabling a Group manager to update access to thousands of records in a single step

Avoid using Google Groups to provide access to confidential or restricted information.

Membership of Google Groups used to manage record access must be reviewed monthly to confirm that only the appropriate people are included. Business area group managers should set themselves a reminder for monthly membership review.

### *Gmail*

An email, along with any attachments, is considered a City record. It may be a non-transitory City record that needs to be kept for a specific period of time to document a business decision, activity or transaction, or it may be transitory and only required for an immediate purpose.

Like other City records, email messages and their attachments need to be managed so that they are:

- accessible to all staff who need the information
- filed so that they can be found
- retained or destroyed in a legally defensible way, as laid out in the City of Edmonton Classification and Retention Schedule and the City’s disposition process for non-transitory City records.

Transitory emails are needed temporarily to complete a routine task or prepare a City record, but they are not required for legal or operational purposes. If you are the sender or have responded to someone else’s email, you are responsible for maintaining the email if it is non-transitory. Emails received from others are considered transitory, as long as you have not edited the email or attachment and forwarded it. Transitory emails should be deleted after 90 days or when they are no longer needed for reference.

A non-transitory email records a decision, transaction or business activity; it needs to be saved as a PDF, along with any attachment(s) and required email metadata (see Table 4). The email should be filed as one document in the correct location. This location might be a business area’s Google Drive folder structure or a database, like SAP or POSSE. Once filed, non-transitory emails can be deleted from your Gmail.

*Table 4: Email elements*

<b>Element</b>	<b>Required</b>	<b>Recommended</b>	<b>Notes</b>
Sender’s name	✓		
Sender’s email address	✓		

Element	Required	Recommended	Notes
Intended recipient(s)	✓		Where an internal message is sent to a group, the creator is responsible for retention of the record.  Records emailed to a distribution list must identify members of that list for the lifetime of that record.
Meaningful subject line	✓		
Message content (body)	✓		
Signature block		✓	
Attachments (if applicable)	✓		An email and its attachment(s) go together. They should be treated as a compound document. This keeps the relationships between all components of the message intact and retains the context of the record.

#### *Email Thread Considerations*

An email thread contains a conversation with at least one response. The conversation can be broken or continued over time, and the topic may change during the conversation. After the last email message on the original topic is sent:

- The individual responsible for maintaining the record copy should file the thread according to the content topic, which may or may not be reflected in the subject line. Other business areas may also choose to keep the record copy if it has significant business value for that business area.
- The filing date for the email and any attachment(s) becomes the start trigger for the retention period. This is due to the way metadata, which is used to calculate retention, is automatically generated in record storage environments.
- All other participants in the message thread should delete their copy as soon as it is no longer needed for reference or for business purposes.
- Copies may be retained as non-transitory for Business area value.

#### *Google Chat*

Google Chat is an instant message feature in the Google Workspace. Chat messages are considered transitory records that are used for immediate informal purposes; if a message is part of a City record, it should not be communicated via Chat. City employees should turn off conversation history for all Chat conversations. If conversation history is saved, you are responsible for and must provide it in response to an access to information request or a legal hold if asked.

### *Google Spaces*

Google Spaces are a type of Google Chat. They are used to facilitate conversation between members of a group and to allow members to locate shared documents and links. The space owner is responsible for deleting the space 90 days after it is no longer in use.

Like all City records and information, formal and informal chats in Google Spaces must be included in response to access to information requests. Users should use Google Spaces as a collaboration and coworking environment; conversations in Spaces should maintain a professional tone and be for reference purposes, not for making corporate decisions.

### *Google Calendar*

Google Calendar meetings and events can be either transitory or non-transitory records. Calendar entries required for a short period, which do not document business activities, are transitory and may be deleted.

Examples include:

- reminders
- lunch with a friend
- declined meeting requests
- meetings not related to projects, policies, decisions, functions, procedures, operations, transactions or other activities of the City

Calendar entries that are evidence of policies, decisions, functions, procedures, operations, transactions or other activities of the City must be kept. Examples include:

- performance reviews
- operations meetings
- project meetings

Be careful not to delete recurring meetings.

## **References and Supporting Resources**

### *Legislation*

- [Municipal Government Act, RSA 2000, c M-26](#)

### *Policy and Policy Tools*

- [A1477 Data and Information Management Administrative Policy](#)
- [City of Edmonton Classification and Retention Schedule](#)

### *Supporting Resources*

- [Corporate Information Management Glossary of Terms](#)
- [Corporate Records and Information Management Accountability Matrix \(RASCI\)](#)
- [Record Naming Principles](#)
- [Transitory Record Decision Tree](#)

## DGWC REVIEW AND SIGN OFF

Only one person from each area needs to sign off.

Subject Matter Expert Area	Branch / Department (or Division)	Sign Off (Name)
Access and Privacy	Office of the City Clerk / Office of the City Manager	<i>Christina Hopkins Crichton</i>
Archives	Community Recreation and Culture / Community Services	<i>Kathryn Ivany</i>
Business Solutions / Google	Open City and Technology / Financial and Corporate Services	<i>Stephen Mundy</i>
Data Analytics	Service Innovation and Performance / Financial and Corporate Services	<i>Keith Wu</i>
Data Governance	Service Innovation and Performance / Financial and Corporate Services	<i>Wojciech Kujawa</i>
Data Ethics	Service Innovation and Performance / Financial and Corporate Services	<i>Jared Bielby</i>
Enterprise Commons	Open City and Technology / Financial and Corporate Services	<i>Non-responsive</i>
Enterprise Performance Management	Service Innovation and Performance / Financial and Corporate Services	<i>Sajid Majeed</i>
Enterprise Architecture / Technology Planning	Open City and Technology / Financial and Corporate Services	<i>Mangulal Halai</i>
GIS	Service Innovation and Performance / Financial and Corporate Services	<i>Nicole Gaskell</i>
Information Security	Open City and Technology / Financial and Corporate Services	<i>Achint Mathur</i>
Information Management	Office of the City Clerk / Office of the City Manager	<i>Gina Smith</i>
Legal Services	Legal Services / Employee and Legal Services	<i>Michelle Bohn</i>
Department or Division Representative		
City Operations		<i>Non-responsive</i>
Community Services		<i>Richard Williams</i>
Employee and Legal Services		<i>Mostafa Nejati Ajibisheh</i>
Financial and Corporate Services		<i>Non-responsive</i>
Integrated Infrastructure Services		<i>Tara Elniski</i>
Office of the City Manager		<i>Christina Molnar</i>
Urban Planning and Economy		<i>Peter Contessa</i>