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| Manual Part: Information Services (IS) | Policy Number: IS13PO | Alberta Policing Standards: PA 9.5, SS 8.1, SS 8.2, SS 8.3, SS 8.6, SS 8.8, SS 8.10 |
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Records Management Policy

Purpose:

To give mandate to the EPS' Records Management Program which facilitates the creation, collection, access, maintenance, protection, retention, and disposition of all EPS records.

To preserve the history and evidence of EPS activities and transactions.

This policy and associated procedures apply to all EPS records created, received or collected, maintained and disposed of in the course of the EPS discharging its mandate, regardless of where they are located or in what form.

This policy does not apply to organizational health and employee wellness records as records containing health information are governed by the *Alberta Health Information Act* and applicable provisions of the *Alberta Occupational Health and Safety Act*, Regulation, and Code. These records are managed under the custody and control of authorized EPS health professionals and safeguarded in compliance with all relevant privacy, confidentiality, and retention requirements.

The Records Management Policy is a component of the EPS' broader data, information, and knowledge governance regime.

Statement of Principle:

EPS records are a business-critical resource and asset.

The EPS is responsible for the management of its records, regardless of media, by practicing strong stewardship from the time of capture to final disposition.

All EPS records are to be treated in compliance with relevant legislation, regulatory requirements and best practices.

All EPS members support accountability, legal compliance, and organizational efficiencies by sharing responsibility for the effective management of EPS records.

Definitions:

Definitions listed in this section apply to this document only with no implied or intended organization-wide or EPS Policy and Procedure Manual wide use.



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Business Records – EPS records which support functions such as the management of facilities, materials, finance, personnel, and information systems. Business records also relate to common management functions such as committee activities, agreement development, contract management, information services, and obtaining legal opinions. These records are not associated with an occurrence or law enforcement activities.

Disposition – The process of either destroying/deleting or transferring records to a Record Centre at the conclusion of its retention period as outlined in the Records Retention Schedule (RRS).

EPS Record – An EPS record means any record in any format within the custody or under the control of the EPS relating to the work of the organization. EPS records include, but are not restricted to, those pertaining to business, law enforcement, and operational activities.

EPS Records Management Program – Encompasses the requirements, standards, people, and systems within the EPS which manage and control EPS records throughout their lifecycle. Components of the EPS Records Management Program include, but are not limited to:

1. the approved EPS RRS based on the EPS's business and law enforcement activities,
2. the EPS Information Security Classification Scheme as expressed within **IS9-1PR Security Classification of Information Procedure**,
3. EPS Records Management procedures and guidelines, and
4. digital preservation technologies.

EPS Records Retention Schedule (RRS) – Describes the records under the control of EPS and the associated “keeping” requirements. The RRS provides a uniform records classification structure for filing electronic and paper records and represents the formal, recorded approval of a decision to retain a set of records for a period of time prior to its disposition. The RRS identifies:

1. record series name (based on functions and activities),
2. office of primary responsibility (which EPS area is responsible for managing the record),
3. length of time and statutory requirements regarding the record to be retained, and



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4. the final disposition date for the record (providing eligibility requirements are met). This could include secure destruction or preservation in an archive.

Health Information / Health Record – As defined in the *Health Information Act*, health information includes any or all of the following two types of information: diagnostic, treatment and care information, and registration information. A “record” means a record of health information in any form and includes notes, images, audiovisual recordings, x-rays, books, documents, maps, drawings, photographs, letters, vouchers and papers and any other information that is written, photographed, recorded or stored in any manner.

Law Enforcement Records – Records created through the administration and management of law enforcement activities, services, and programs, as well as by units that support law enforcement functions such as evidence management, court services, and crime analysis. These records are often produced through policing activities but are not tied to a specific occurrence or event.

Lifecycle (of a record) – The lifecycle of a record is a series of phases starting from a record’s creation or reception by the EPS, through to its use, maintenance, and temporary storage before its ultimate destruction or archival.

Operational Records – All EPS records associated with an occurrence number including, but not limited to, occurrence reports and associated documents, notes, recordings, photographs, digital evidence, etc.

Personal Information Records – As defined in the *Access to Information Act (ATIA)* and *Protection of Privacy Act (POPA)*, a record containing the personal information of an identifiable individual, excluding a health information record.

Record – A record of information in any form. A record includes, but is not limited to, notes, images, audio visual recordings, audio recordings, documents, maps, drawings, photographs, letters, vouchers, forms, MS Teams or SMS messages, and papers and any other information that is written, photographed, or recorded regardless of the means of storage.

Responsive Information – Information that is reasonably related to pending or current litigation, investigation, grievance, audit, or access to information request.

Transitory Records – EPS records with short-term or limited value. Transitory records are not an integral part of the EPS’s business, law enforcement, or operational records files and are not required to sustain business or operational functions. However, transitory records are subject to legal proceedings and legal hold considerations.

Examples of transitory records include, but are not limited to, blank forms or templates, duplicate copies of an original document, brochures, flyers, or digital media.



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Policy Statement:

- A.** All records created, received, collected, or preserved by EPS members in the course of discharging EPS's mandate are the property of EPS as vested under the authority of the Chief of Police. Members must surrender all records to the EPS upon termination of service.
- B.** Members must carry out tasks related to the creation, storage, maintenance, cataloguing, use, protection, dissemination, and disposal of EPS records responsibly, in a timely manner, and with the utmost care.
- C.** All EPS records are managed through their lifecycle according to the EPS Records Management Program.
- D.** All EPS areas are responsible for maintaining efficient paper and electronic filing systems for EPS records in accordance with the RRS as a part of the EPS Records Management Program.
- E.** EPS records must be stored in an authorized way to ensure that they are secure and that access is limited to authorized users. EPS records being electronically transported outside of EPS networks must be encrypted on approved devices. EPS records must not be captured or stored on personally purchased electronic devices. EPS physical records being transported outside of EPS property must be stored in such a way to ensure that they are secure and that access is limited to authorized users.
- F.** EPS records must only be used by those persons duly authorized to access them by virtue of their position within EPS and only for the purpose for which use has been authorized. EPS records must not be accessed or manipulated for personal gain or out of personal interest or curiosity.
- G.** Wherever possible, EPS records should be made available to all EPS members who have a legitimate business need to access those records.
- H.** EPS records are disposed of only in accordance with an approved EPS RRS:
 - 1. Random and unplanned destruction of EPS records may be considered a suspicious activity and could be found by courts to constitute an illegal destruction of evidence, known as spoliation.
 - 2. The disposition of non-transitory business, law enforcement, or operational records must only occur through coordination with Information Governance Branch.



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3. Members may dispose of transitory records without consulting with Information Governance Branch provided that:
 - a. transitory paper records classified as Protected A or above are shredded, and
 - b. unclassified transitory paper records are shredded, as opposed to recycled, when the confidentiality or sensitivity of their content requires such treatment (such as receipts or employee lists).
 4. Information Governance Branch must be contacted to facilitate appropriate disposition of original physical media such as microfilm, CDs, and video and audio tapes.
- I.** Disposition of relevant or responsive EPS records will cease in the event of litigation, investigation, grievances, audit, or a request for information pursuant to *ATIA*. Members are responsible for notifying their supervisor of the potential existence of responsive records who will notify Legal Services Branch for coordination of the suspension of the destruction of those records.
- J.** Personal information records are managed in accordance with *POPA* and all relevant privacy legislation, regulations and policies. Health information records are managed in accordance with the *Health Information Act* and all relevant privacy legislation, regulations and policies.