

SECTION:

ADMINISTRATIVE POLICY 55

TITLE: Records Management

I. PURPOSE AND SCOPE

Arizona Revised Statute [§41-151.14](#) requires the head of each state and local agency to establish and maintain an active continuing program for the economical and efficient management of all records from creation to disposition and to put the necessary policies and procedures in place to ensure that its records management practices comply with the requirements of the law.

II. POLICY STATEMENT

It is City of Avondale (City) policy that all records created and received by officials, employees, or representatives of the City in the performance of their duties are property of the State pursuant to A.R.S. [§41-151.15](#) and shall be managed in accordance with this policy and the provisions set forth in the [Records and Information Management Program Manual](#).

All records of continuing value shall be preserved and appropriate safeguards implemented to protect the City from illegal removal, loss, or destruction of records.

Records that have met their legal, regulatory, or administrative retention period shall be disposed of in accordance with established procedures outlined in the [Records and Information Management Program Manual](#) using State approved retention schedules.

The City follows sound procedures for security, privacy, and confidentiality of its records.

III. DEFINITIONS

A. Records: All books, papers, maps, photographs, or other documentary materials regardless of physical form or characteristics made or received by the City in the pursuance of law or in the transaction of government business.

B. Valuable Asset: Information is a resource with the same importance as other resources like people, money, and facilities. The information resources of the City must therefore be managed as a valuable asset. Appropriate records management is a vital aspect of maintaining and enhancing the value of this asset. The City considers its records to be a valuable asset to support transparency requirements as well as protect the interests of the City, the rights of the employees, and the citizens of Avondale.

IV. POLICY PROVISIONS

A. Applicability to employees

1. This policy applies to all City employees who create and/or receive records in the transaction of public business regardless of format (this includes e-mail).
2. Employees who violate the Records Management Policy provisions in this policy may face disciplinary action up to and including termination.

B. Applicability to records

1. All records that are evidence of the business transaction of the City are public records and shall be managed and kept for as long as they are required for functional and/or historical purposes.
2. Records that approve an action, authorize an action, contain guidance, advice, or direction, relate to projects, formal business communications, contain policy decisions, etc. should be managed as records and should be filed in accordance with established procedures outlined in the [Records and Information Management Program Manual](#).
3. Emails that are public records shall contain sufficient information to ensure that they are properly contextualized and that they are meaningful and accessible over time.
4. Text messages and social media are considered informal communications mediums and should not be used for formal work product.

C. Authority

1. Arizona Revised Statute ARS [§41-151.14](#) – State and Local public records management; violation, classification, definition.
2. Arizona Revised Statute ARS [§41-151.19](#) – Determination of value; disposition.
3. Arizona Revised Statute ARS [§39-101](#) – Permanent public records; quality; storage; violation; classification.
4. Arizona Revised Statute ARS [§13-2407](#) - Tampering with a public record; classification.

V. PROCEDURES

A. City Clerk

1. Appointed by the City Manager, the City Clerk is the Chief Records Management Officer for the City and is responsible for administering the City's Records Management Program.
2. The City Clerk designates the Records Administrator to establish and maintain the records management program for the City. He/she is entrusted to perform such duties as necessary to enhance the record keeping and records management practices and to enable compliance with legal requirements.

B. City Manager, Assistant City Managers and Department Directors (Senior Management)

1. Senior management is responsible for the implementation of this policy in their respective units and ensures that staff is aware of their record keeping responsibilities.
2. Senior management shall designate one or more persons to act as Records Management Officer(s) (RMO) for their Department and notify the Records Administrator upon appointment of who shall maintain and update the City's directory of RMO's.
3. Ensure City staff are assigned access rights only to records required to perform their job.

C. Records Administrator

1. The Records Administrator is responsible for the day to day oversight of the City's Records Management Program. He/she is responsible for establishing and maintaining an active and continuing program for the economical and efficient management of the records.
2. The Records Administrator is responsible for ensuring that records are managed in accordance with record management principles established in the [Records and Information Management Program Manual](#) and in accordance with state law.
3. The Records Administrator will serve as the liaison to the Arizona State Library, Archives, and Public Records and ensure the City's compliance with the directives established by the State.

4. The Records Administrator is responsible for determining retention periods in consultation with the users and legal services of those records taking into account the functional, legal, and historical need of the body to maintain this information.
5. The Records Administrator is responsible for the implementation and training of this policy to City staff as well as educating City employees in records management principles and procedures.
6. The Records Administrator is responsible for ensuring that appropriate protocols are in place to protect sensitive information from unauthorized disclosure and/or loss of information.

D. Chief Information Officer/Information Technology Director (CIO)

1. The CIO and their designee(s) shall work in conjunction with the Records Administrator to ensure that public records are properly managed, protected, and appropriately preserved for as long as they are required for business, legal, and long-term preservation purposes.
2. The CIO and their designee(s) shall ensure that all electronic systems capture appropriate systems generated metadata and audit trail data for all electronic records to ensure that authentic and reliable records are created.
3. The CIO and their designee(s) shall ensure that electronic records in all electronic systems remains accessible by migrating them to new hardware and software platforms when there is a danger of technological obsolescence including media and format obsolescence.
4. The CIO and their designee(s) shall ensure that all data, metadata, audit trail data, operating systems, and application software are backed up to enable the recovery of authentic, reliable and accessible records should a disaster occur including stored in a secure off-site storage.

E. Records Management Officer (RMO)

1. The RMO is responsible for coordinating the records management responsibilities for their respective department and participates as a member of the Records Management Team.

F. City Clerk Assistant(s)

1. The City Clerk Assistant(s) assists the Records Administrator with the day-to-day clerical functions associated with the records management program and is a permanent member of the Records Management Team.

G. Employees

1. All employees shall adhere to this policy and the provisions set forth in the [Records and Information Management Program Manual](#).
2. All employees are responsible for managing records entrusted to them with care and will evaluate said records to determine whether it is a record or non-record. Employees will file said records accurately and in a timely manner including email, within the file structure provided for their respective department to ensure this valuable information is preserved for its respective lifecycle.
3. All employees shall participate in records purge days and will follow the established guidelines for disposition.
4. Upon becoming aware of potential litigation, employees shall notify the Records Administrator so that he/she may in turn notify the City Attorney, City Clerk, and others as appropriate so that the necessary measures may be established to prevent the illegal destruction of pertinent records.
5. Employees shall not save records on electronic devices such as CD/DVDs, memory keys, and any personal storage devices, as they bypass the City's records management and disaster recovery processes. If special copies are required for legal proceedings to similar exceptions, employees must coordinate with the City's Records Administrator.
6. Employees shall not access or share private/sensitive information without authorization.
7. Employees shall notify the City Clerk, RMO and Records Administrator of incidences of accidental deletion or destruction of records before retention period has been met.

H. Records disposal

1. All paper records meeting their retention period will be destroyed unless those records are involved in a legal hold or an audit. Destructions will occur annually (at a minimum) allowing staff sufficient time for review, notice of destruction, preparation of forms, and the physical destruction.

2. Electronic records meeting their retention period will be destroyed unless those records are involved in a legal hold or an audit. Destructions will occur annually during record purge days. An employee compliance form will be filled out and provided to the Records Administrator.
3. The City's ultimate goal is to retain email for one year in the users email account. In an effort to achieve this goal incremental steps are being executed in order to manage this process while also adhering to the records retention schedule. The initial phase is to delete all emails that are seven years or older that are not deemed records. Emails that are deemed records are to be saved in the employees retain folder in outlook. Emails housed in the employees retain folder will be maintained indefinitely until purge criteria is addressed and retention implemented.
 - Phase I will be completed by January 31, 2014.
 - Phase II is to delete all emails that are five years or older using the same process as in Phase I and will be completed by April 31, 2014.
 - Phase III is to delete all emails that are 3 years and older using the same process as Phase I & II and will be completed by August 31, 2014.
 - Phase IV is the final phase and is to delete all emails that are 1 year and older. This phase will completed by January 31, 2015 bringing the City current.

Once the "phased" email destruction project is complete, email purge days will be held semi-annually. Staff will have two weeks to review emails and move them to the retain folder. After the two week period, the Records Administrator will notify IT to perform the destruction.

The enterprise journal will be deleted one year after the record purge occurs.

- a. Email deleted and placed in the "trash" will be auto deleted every 30 days.
- b. Voice Mail messages are considered an informal means of communication to use for coordination purposes only and will be retained for 30 days. Exceptions to the 30 day rule will be considered for special circumstances that require this information for a longer period of time.
- c. Voice to Text - due to the technological and practical limitations for preservation of this information the City does not consider this information a record.
- d. Calendar information will be retained for one year.

- e. Upon departure from the City, an employee's email, contacts and calendar shall be disabled and an automatic reply will be set to inform senders how to forward information to alternate City staff. The position's supervisor has 30 days to review email in the separated employee's account to retain required information. After 30 days, the account shall be deleted and all information in the email account's "Retain" folder shall be transferred to the City Clerk's office for disposition.

I. Training

1. The Records Administrator will train all Records Management Officers in the records management policies and procedures to assist them in facilitating the records management activities in their respective department.
2. The Records Administrator shall identify such training courses that are relevant to the duties of the Records Management Officers and shall forward this information as appropriate.
3. The Records Administrator will train all employees in the records management policies and procedures and will serve as a resource for employees with records related questions.

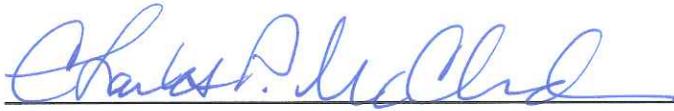
J. Monitoring and review

1. The Records Administrator will conduct an audit of the records management practices for the City on an annual basis and provide a report to the City Manager through the City Clerk on their findings.
2. This policy and the [Records and Information Management Program Manual](#) will be reviewed on an annual basis and shall be updated as appropriate to ensure that it meets all statutory, regulatory and directives of the State of Arizona.

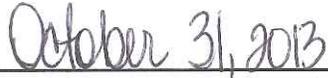
K. Relationship with other policies

1. See Chapter 16 – Information and Communication Technology Policy.

VI. APPROVAL



Charles McClendon, City Manager



Date of City Manager's Approval