
Date

The following was adopted as an Administrative Policy by the Chief Administrative Officer on December 15, 2020.

Purpose

In order for electronic records to take the place of hard copy documents as the official record, the reliability, integrity, and authenticity of the electronic record as an accurate and trustworthy reproduction of the original must be demonstrable. In converting a record from hard copy to electronic, there must be no loss, destruction or alteration of content and form. This policy sets out the policies and procedures for converting records to electronic format to ensure they are acceptable to courts as documentary evidence, reliably support business decisions and ensure they remain fixed, stable and readily accessible for the entirety of their lifecycle.

Over time, electronic records will become more prevalent; however, a portion of District of Lake Country (District) records will continue to exist in paper format.

Policy

1. DEFINITIONS

ARMA means the Association of Records Managers and Administrators.

Authenticity means a record can be proven to be genuine, not a counterfeit, free from tampering or corruption, was created or sent by the person and at the time claimed.

CGSB means the Canadian General Standards Board.

Conversion means the act of changing records from one medium, format or system to another while maintaining the authenticity, integrity, reliability and usability.

Electronic Record or electronic document means any recorded information created, used, recorded, converted, scanned or stored in a digital medium, using computer hardware or software and human intelligence to create, modify, store, access and retrieve the documents.

Integrity means the record is complete and unaltered.

ISO means the International Organization for Standardization.

Manual means the most recent version of the LGMA Records Management Manual for Local Government Organizations including any additions, alterations or procedures authorized by the Corporate Officer.

Metadata means data that describes, explains, locates or makes it easier to retrieve, use or manage an information resource, describing context, content and structure of records and their management through time.

Official Record means the final version of a record that is classified and filed in the records management system whether in hard copy or electronic format.

Record includes books, documents, maps, drawings, photographs, letters, vouchers, papers and any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means but does not include a computer program or any other mechanism that produces records.

Records Management System means a system used to manage the records of the municipality from record creation to record disposal.

Records Retention Schedule means the established schedule listing records, the period of time they are to be retained for and their final disposition in order to meet operational, legal, regulatory, financial and other requirements.

Reliability means the trustworthiness of a record as a statement of fact and the ability for the record to serve as reliable evidence. Reliability is established by examining the completeness of the record and the amount of control exercised on the process of its creation.

Scan, scanned or scanning means the process of converting hard copy documents to an electronic format.

Source Record means the original version of a record from which a copy is made or converted.

Transitory Record are records of temporary usefulness that are not an integral part of an administrative or operational records series, that are not regularly filed with a standard classification system, and that are only required for a limited period of time for the completion of an action or the preparation of an ongoing record. Transitory records are not required to meet statutory obligations or to sustain administrative or operational functions.

2. POLICY

- 2.1. The District may convert source records or hard copy records into electronic records as part of its usual and ordinary course of business.
- 2.2. Pursuant to the *Canada Evidence Act*, electronic records are admissible in court as long as an organization can establish the authenticity and integrity of both the electronic record and records system.
- 2.3. Electronic Records must:
 - (a) be saved on the District's network and backed up by network processes; and
 - (b) be retained and disposed of in accordance with the Records Retention Schedule.
- 2.4. Where an Electronic Record has been converted from a Source Record in accordance with this policy and the Source Record has been destroyed, the Electronic Record will be considered the Official Record unless otherwise indicated. In the case of discrepancy, the Corporate Officer shall, considering the completeness, authenticity and integrity of the record, make a final determination on the Official Record.

3. STORED IN CANADA

- 3.1. All records converted to electronic format containing personal information must be stored and accessed only in a secure environment in Canada pursuant to the *Freedom of Information and Protection of Privacy Act*.

4. RESPONSIBILITY

- 4.1. Staff are responsible for:
- (a) converting and creating electronic records in accordance with policies, procedures, bylaws and the Manual;
 - (b) conducting quality control when converting documents to electronic records ensuring accuracy, completeness and authenticity;
 - (c) ensuring destruction of Official Records and Source Records in accordance with this policy;
 - (d) destroying transitory electronic records after their usefulness has expired.
- 4.2. The Information Management Department is responsible for maintaining the systems on which electronic records are stored, accessed and managed.

5. METADATA

- 5.1. Where expedient and beneficial, the District shall preserve document metadata to assure future interpretation and trustworthiness of electronic records despite changes in technology over time. Metadata may be captured automatically or manually.
- 5.2. Examples of metadata to be captured include:
- (a) Date, description and author of document;
 - (b) File format;
 - (c) Name of the person converting the record and date the conversion took place;
 - (d) Email records shall include: the name and title of the sender and the date received.

6. FILE FORMAT

- 6.1. PDF file formats can be manipulated jeopardizing the authenticity of the electronic record as an accurate and trustworthy reproduction of the original.
- 6.2. Records converted to Official Records after approval of this policy shall be saved as PDF/A to enable long-term digital preservation of electronic records.
- 6.3. Records converted prior to adoption of this policy may be saved as PDF or PDF/A format.
- 6.4. The Corporate Officer, in consultation with the Information Management Department, may determine the appropriate PDF format to be used.

7. CONVERSION

- 7.1. When converting records to an electronic format staff will conduct quality control by comparing the original document to the scanned document. Quality control is required to ensure there are no issues during the scanning process and to reduce the risk of information being of unsatisfactory quality.
- 7.2. Documents that do not meet a quality control check must be rescanned.

- 7.3. Each quality control check will examine:
- (a) Accuracy of the scanned document vs the original;
 - (b) Optical character recognition, indexing and searchability;
 - (c) Identical page counts;
 - (d) Completeness of detail, contrast and resolution;
 - (e) Accuracy of colours on the scanned document vs the original;
 - (f) Removal of blank, duplicate or extra pages;
 - (g) Verify pages are in the correct order;
 - (h) Density of solid back areas; and
 - (i) Overall visibility and legibility with nothing hindering the ability to read or view the content.
- 7.4. Once a document is converted, it must:
- (a) be retrievable without loss or change;
 - (b) be named in accordance with the File Naming Policy;
 - (c) be stored within a secure environment;
 - (d) not be revised;
 - (e) only be deleted in accordance with the Records Retention Schedule.

8. DESTRUCTION OF RECORDS

- 8.1. Source records may be disposed of 15 days after the date of conversion so long as a quality control check has been completed.
- 8.2. For batch conversions where a large number of files are being converted (e.g. a box of files or an entire roll file folder), staff will:
- (a) complete a Conversion and Disposition Log (see attached) prior to destruction
 - (b) which includes the name of the person doing the conversion, the date of conversion, a summary or list of the files converted and destroyed, confirmation of quality control check and date of disposition;
 - (c) save a copy of the Conversion and Disposition Log as a word document in the electronic file and email a copy to Corporate Services
- 8.3. Staff are not required to complete a Conversion and Disposition Log for conversion of individual files as long as records are converted in compliance with this policy and have undergone a quality control check prior to disposing of the Source Record.
- 8.4. Destruction of Official File Copies, whether hard copy or electronic, must be done in accordance with the Records Retention Schedule, recorded and authorized by the department head or Corporate Officer. Departments shall be responsible for retaining evidence of authorization to destroy records.
- 8.5. Records pertaining to any actual or pending investigation, audit, freedom of information access request, litigation or legal claim should not be destroyed.
- 8.6. Source Records that must be retained in hard copy and cannot be destroyed include:
- (a) originally signed bylaws, policies, Council and Committee minutes;
 - (b) records identified by law, legal counsel, legislation, bylaw, policy or business requirements;
 - (c) records where there is unreasonable risk incurred by not retaining the hard copy format.
- 8.7. The Corporate Officer may amend the list of Source Records to be retained in hard copy format in accordance with the Manual, legislation and legal consultation.

8.8. Source Records that cannot be destroyed may be converted to electronic format, but the Source Record must be retained in accordance with the Records Retention Schedule.

9. PRESERVATION OF RECORDS

9.1. Electronic Records must be converted to each successive generation of system or, where appropriate, output to a stable non-electronic form.

9.2. Each conversion in electronic form must replicate the form and content of the original record. If information is moved between storage devices as part of a file migration process, details of the move shall be stored in an audit trail.

10. DOCUMENTARY EVIDENCE

10.1. In accordance with CGSB-72-34-2017-Electronic Records as Documentary Evidence, records converted to electronic format will meet the standards of proof for authenticity of the record, which can be inferred from the integrity of the electronic records system in which the record is made, received or stored, and that the record was made in the usual and ordinary course of business.

11. REFERENCES

11.1. The following acts, regulations, codes and standards are used for determining retention and conversion processes for electronic records management.

- (a) [ARMA-TR 27-2015-Retention Management for Records and Information](#)
- (b) [ARMA-TR-30-2017 Implementing the Generally Accepted Recordkeeping Principles](#)
- (c) [Evidence Act](#)
- (d) [CAN-CGSB-72-34-2017-Electronic Records as Documentary Evidence](#)
- (e) [Community Charter](#)
- (f) [Electronic Transactions Act](#)
- (g) [Evidence Act](#)
- (h) [Freedom of Information and Protection of Privacy Act](#)
- (i) [Interpretation Act](#)
- (j) [ISO-15489-1-2016-Information and Documentation-Records Management-Part 1](#)
- (k) [ISO-19005-3-2012-Electronic document file format for long term preservation](#)
- (l) [Local Government Act](#)
- (m) [Canada Evidence Act](#)

Original signed by Alberto De Feo

Alberto De Feo, CAO

December 17, 2020

Date



LAKE COUNTRY

Life. The Okanagan Way.

Conversion & Disposition Log

Name of person doing the conversion: _____

Date of conversion: _____

File description or list of files: _____

QUALITY CONTROL CHECK

- Make sure the document is searchable by running the character recognition tool (Scan and OCR tool)
- Compare the original hard copy to the scanned version
- The number of pages match, are in order and nothing is missing
- The scan is clear and the text can be easily read
- Detail, contrast and resolution is clear and legible
- Both sides of double-sided pages have been scanned
- The colors can be seen and are comparable to the original
- Remove blank, duplicate or extra pages
- There is nothing hindering the ability to read or view the content

FILE FORMAT AND NAMING

- Convert the record to PDF/A-3a
 - o File, Save As Other, Archivable PDF/A
 - o In Save As screen, select Settings below Save As Type
 - o Select PDF/A-3a and ok
- The file is named in accordance with the File Name Convention

DESTROY ORIGINALS

Date originals destroyed (at least 15 days from date of conversion) _____