Antelope Valley Transit Authority

Policy Title	Version / Date
Records and Information Management Policy	*Version 3 / May 26, 2015*
Approvals	*Date*
Executive Director	
[reference number, if used]	

1. Purpose

The Purpose of this Policy is to define the requirements for managing the records and information assets of the Antelope Valley Transit Authority ("AVTA") in compliance with the applicable laws, regulations, and business operational requirements.

2. Scope

This Policy applies to employees, temporary workers and contractors of AVTA who act on behalf of AVTA and who have access to, or use of, AVTA records and information assets to the extent they are involved in the creation, maintenance or storage of AVTA's records and information.

Definition of Information

This Policy governs all types of AVTA records and information created, received or distributed by AVTA in the course of its business, including, but not limited to:

a) Paper documents, forms, reports, manuals, maps, drawings, correspondence and files;

b) Computer-received and generated records and information in structured or unstructured format, electronic communication, and metadata;

c) Records and information in other formats such as microfilm, videos, photographs, etc., regardless of the location or device upon which the information is stored.

3. Policy Statement

3.1. Ownership

Records and information created, received or distributed in the course or conduct of AVTA's business is the exclusive property of AVTA. Therefore, records and information are subject to compliance with this Policy, the associated Retention Schedule and any other AVTA governance requirements.

3.2. Authenticity

AVTA is committed to creating and maintaining complete, accurate, and trustworthy records and information that documents its business activities. Deliberately creating false or misleading records or information regarding AVTA's activities is strictly prohibited.

Records and information are potentially discoverable in litigation, regardless of storage medium and regardless of physical location. Records and information should not contain language that is misleading, incomplete, inaccurate, fraudulent, harassing, embarrassing, sexually explicit, profane, obscene, intimidating, abusive, libelous, defamatory, or that violates any laws or regulations.

3.3. Classification

Records and information will be created, stored and managed with the appropriate classification that enables their protection as well as necessary access for future use.

3.4. Records Management Technician

Position assists staff, coordinates and maintains the Authority's records management program and including imaging, filing, records systems, and document retention, storage, and retrieval systems; performs a variety of administrative duties in support of the assigned department; and performs related work as required.

3.5. Functional Filing and Retention

Records and information is to be retained in accordance with the Functional Filing and Retention Schedule. When records or information completes its retention period, regardless of the format, it shall be deleted or disposed of in compliance with AVTA procedures.

The Records Management Technician shall annually review all records held by AVTA. Those records designated for destruction shall be validated for accuracy and upon positive confirmation all files indicated for destruction shall be purged from the system, in accordance with this policy.

3.6. Storage

Records and information no longer considered active may be transferred to designated offsite storage facilities to fulfill retention requirements. Records and Information transferred to offsite storage are to be indexed for future access.

AVTA information should not be stored in unauthorized locations or on any personally owned devices.

3.7. Availability

Records and information must be available for future business, litigation, and investigations as necessary, regardless of storage location.

Records and information that is deemed "public" is to be made available for the public to obtain in accordance with laws and regulations.

3.8. Exiting Employees and Contractors

When an employee or a contractor leaves AVTA, the supervisor, manager or director is responsible for complying with the requirements of this Policy and any supporting procedures for retaining and managing the records and information of the exiting employee or contractor.

3.9. Suspending Retention Requirements

Records and information relevant to litigation, an investigation, or an audit and subject to a Legal Hold are to be retained and preserved until further notice from AVTA's General Counsel, or designated outside counsel, regardless of the retention period set forth in the Retention Schedule.

Records and information subject to a Legal Hold that is no longer required for active business purposes may be transferred to offsite storage facilities for preservation in coordination with AVTA's General Counsel, or designated outside counsel.

3.10. Vital Information

Records and information designated as "vital" are to be protected in a manner that establishes the priority of recovery of the data in a timely manner following a disaster or system disruption.

3.11. Recovery Backups

Disaster recovery backups are exact copies of an operating system, associated application and data created for the sole purpose of recovering data in the event of a disaster and are not subject to the requirements of the Retention Schedule because they are duplicate documents. Backups serve as a level of protection for electronic systems and the data that is stored on those systems.

3.12. Historical Records

Historical Records, as defined on the Retention Schedule, are valuable in documenting AVTA's history and providing information for researchers. Historical Records are to be preserved so as to assure their ongoing availability and access.

4. Policy Review

This Policy and the Retention Schedule may be amended or modified from time to time, as necessary, to account for changes in legal, regulatory or operational requirements for information management.

5. **Compliance**

   Violations of this Policy may result in disciplinary action up to and including termination of employment. If you have questions regarding this Policy, please contact your supervisor or the Records Management Technician.

6. **References**

   Functional Filing and Retention Schedule

AVTA RECORDS AND INFORMATION MANAGEMENT POLICY MAP

POLICY MAP TO PROCEDURES & SUPPORTING DOCUMENTATION

Each item number on the left refers to a section in the draft Records and Information Management (RIM) Policy. In the column titled "Required Subordinate Document Name" are listed the procedures, standards, guidelines, or other reference documents that will be needed to fully implement that particular Policy requirement.

Item	RIM Policy Section	Required Subordinate Document Name	Purpose
1.	Purpose	☐ Glossary of Terms	Explanation of all the terms within the policy and any subordinate documents.
2.	Scope	☐ Convenience Information	Defines what not a Record to exclude from policy requirements.
3.	3.1 Ownership	☐ Personally Owned Device Procedure	Directs staff on the proper management of records and information on personally owned devices (e.g., smart phones, tablets, personal laptops).
4.	3.2 Authenticity	☐ Document Filing Guidelines ☐ Electronic Records Systems Standard ☐ Electronic Communication Standard ☐ Social Media Standard	Directs staff on the proper management of information including electronic communication.
5.	3.3 Classification	☐ Functional Filing System	Clearly defines how information is to be classified and labeled for future access.
6.	3.4 Records Management Technician	☐ Staff Position	Clearly defines how this position performs their function.
7.	3.5 Retention	☐ Records Retention Schedule ☐ Change Management Procedures (*for retention schedule*) ☐ Change Management Form (*for retention schedule*) ☐ Communication Plan / RIM Event Plans ☐ Proper Disposition Standard ☐ Disposition Procedures ☐ Certification Form (*for third parties to sign if desired*) ☐ System / Application Decommissioning Standard	Defines the retention requirements for records and information and the proper procedures for securing and saving information based on the requirements.

Item	RIM Policy Section	Required Subordinate Document Name	Purpose
8.	3.6 Storage	☐ Records Storage Transfer Procedures ☐ Stored Records Access Procedures ☐ Hard Copy Records Onsite Filing Guidelines ☐ Offsite Storage Standard ☐ Offsite Storage Vendor Auditing Procedure ☐ Data Migration Standard	Defines the steps for adequately storing, labeling and then retrieving inactive records and information.
9.	3.7 Availability	☐ Functional Filing System and Inventory/Indexes	Provides a method of filing documents so they can be accessed.
10.	3.8 Exiting Employees and Contractors	☐ Exiting Employee Procedure	Defines the steps for properly addressing the records and information assigned to employees who are leaving the Organization's employment.
11.	3.9 Suspending Retention Requirements	☐ Preservation Guidelines ☐ Legal Hold Procedures ☐ Legal Hold Release Procedures ☐ Legal Hold Notices ☐ Legal Hold Release Notices	Prevents unauthorized or accidental deletion or disposal of information that is subject to a Legal Hold. These documents provide adequate direction to staff on what is expected of them.
12.	3.10. Vital Information	☐ Vital Records Protection Standard ☐ Vital Records Access Procedures *(after a disaster)*	Directs staff clearly on how to protect and recall vital records prior to and directly after a disruption in business.
13.	3.11. Recovery Backups	☐ Disaster Recovery / Business Continuity Plans ☐ DR / BC Plan Testing Protocols	Protects the organization from the inadvertent loss of information due to unforeseen loss or disruption.
14.	3.12 Historical Records	☐ Historical Records Standard ☐ Preserving Historical Records Procedure	Defines the criteria for declaring a record as Historic, and directs staff in the proper protection of historical records.

Item	RIM Policy Section	Required Subordinate Document Name	Purpose
15.	All Sections	☐ Toolkit for Records Management Technician / Coordinators / Liaisons / staff to use handbooks, forms, posters, RRS Calculator, Talking Points, etc.	Enables Records Management Technician / Coordinators / Liaisons to more effectively support AVTA's Global RIM Program.
16	All Sections	☐ Training Standard ☐ Training Slides / Course Materials ☐ RIM Program Communication Plan ☐ Frequently Asked Questions (FAQs) ☐ New Hire Orientation Training ☐ Records of Exiting Employee Procedures	Informs staff of rules and requirements along with clearly defining the expectations of employees.

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