

Specimen — illustrative example

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Records Retention and Disposal Policy

Town of Quarry Bend

Document type	policy	Version	1.0 Draft
Owner	Director of Corporate Services	Customer decision role	Chief Administrative Officer
Effective date	Upon customer release	Review cycle	Annual
Framework basis	RiskWoven AI practical best practices		
Jurisdiction	Ontario, Canada		
Prepared for	Town of Quarry Bend	Industry	Municipal government
Organization size	101-500	Locations	Not specified

Advisory draft for accountable-owner and professional review. Validate legal, regulatory, contractual, technical and operational requirements before customer release. This is not legal advice, a certification, or a compliance determination.

1. Purpose

This policy establishes the Town of Quarry Bend's mandatory requirements for retaining, managing and disposing of its records. It ensures that records are kept for as long as they are

needed to support municipal operations, meet statutory obligations and defend the Town's legal interests, and that they are disposed of securely and accountably once those needs are satisfied.

This policy applies alongside the Town's records retention by-law. Where the by-law sets a retention period for a record class, the by-law governs. This policy sets the governance framework within which the by-law operates.

2. Scope

This policy applies to:

- a) All Town of Quarry Bend employees, contractors and council members who create, receive, store or dispose of records in the course of municipal business.
- b) All records in any format — paper, electronic, audio-visual or otherwise — held in the municipal office, in the Town's Azure Canada Central environment, or in any system operated by a third party on the Town's behalf.
- c) All record categories identified in Section 5, including resident service request records, grant application records, council records and employee records.
- d) Third-party suppliers who hold or process Town records under contract. Obligations on those suppliers are set out in Section 9 and are governed by the Third-Party Risk Management Policy.

No resident data is held or processed outside Canada. This policy applies to all locations where Town records are held.

3. Definitions

Record — Any document, communication, data set or other information, in any format, that the Town creates or receives in the conduct of municipal business and that is evidence of a decision, transaction, obligation or activity. This includes emails, service request entries, grant application files, council minutes, resolutions, by-laws, contracts and employee files.

Retention period — The minimum length of time a record must be kept before it is eligible for disposition. Retention periods for each record class are set by the Town's records retention by-law and, where applicable, by the provincial schedule for that class.

Legal hold — A formal suspension of normal disposition for records that are, or are reasonably anticipated to be, relevant to litigation, a regulatory investigation, an access-to-information request or any other legal proceeding. A legal hold overrides the retention schedule for the affected records until the hold is released.

Disposition — The action taken at the end of a retention period: secure destruction, transfer to an archives, or continued retention under a documented exception. Disposition is not complete until a disposition record has been created.

Record owner — The department head or designated manager accountable for a defined class of records. The record owner ensures that records in their class are created, stored, retained and disposed of in accordance with this policy and the retention by-law.

4. Policy Statement

The Town of Quarry Bend must manage its records as a corporate asset and a public trust. Records must be:

- a) Created and captured in a manner that preserves their authenticity and integrity.
- b) Retained for the period required by the records retention by-law or applicable provincial schedule, whichever is longer.
- c) Protected from unauthorised access, alteration or premature destruction in accordance with the Information Security Policy and the Data Classification and Handling Standard.
- d) Disposed of securely, with evidence of disposition retained, once the retention period has expired and no legal hold or exception applies.
- e) Preserved in full when a legal hold is in effect, regardless of where they are stored or what their scheduled disposition date would otherwise be.

The Town does not retain records beyond their required period without documented justification. Indefinite retention is not an acceptable substitute for a defined schedule.

5. Retention Schedule

5.1 Governing instrument

Retention periods for all Town record classes are set by the Town's records retention by-law. Where a provincial schedule applies to a record class, the longer of the by-law period and the provincial schedule period governs. Operational preferences do not override either instrument.

5.2 Record classes in scope

The following record classes are subject to this policy. Each class carries the retention period established in the by-law or applicable provincial schedule. Record owners must confirm the current period for their class against the by-law at each annual review.

Record class	Record owner	Governing period
Resident service request records	Director of Corporate Services (or delegate)	As set by the retention by-law / provincial schedule
Grant application records	Director responsible for grants administration	As set by the retention by-law / provincial schedule
Council records (minutes, resolutions, by-laws)	Clerk	As set by the retention by-law / provincial schedule
Employee records	Director of Human Resources (or equivalent)	As set by the retention by-law / provincial schedule
Access-to-information request records	Clerk	As set by the retention by-law / provincial schedule
Contracts and procurement records	Director of Corporate Services (or delegate)	As set by the retention by-law / provincial schedule

The Town must maintain a complete records inventory that maps every active record class to its record owner, storage location, retention period and current disposition status. The Director of Corporate Services is accountable for maintaining that inventory.

5.3 Records not yet scheduled

Any record class not yet assigned a retention period in the by-law must be reported to the Director of Corporate Services. The Director of Corporate Services must initiate a by-law amendment or seek a formal interim determination from the Clerk and municipal solicitor before records in that class are disposed of.

6. Legal Holds

6.1 Issuing a hold

The Clerk issues a legal hold on the advice of the municipal solicitor. A hold may be issued in anticipation of, or in response to, litigation, a regulatory investigation, an access-to-information request that requires preservation, or any other legal proceeding that makes records relevant.

6.2 Scope and effect

A legal hold immediately suspends normal disposition for all records within its scope, regardless of their scheduled disposition date. Records subject to a hold must not be altered, deleted or transferred until the hold is released. This obligation applies to records held in the municipal office, in the Azure Canada Central environment and by any third-party supplier.

6.3 IT preservation

On receipt of a legal hold notice, the IT function must preserve all affected systems and data in their current state. The IT function must confirm preservation to the Clerk in writing before the end of the business day on which the hold notice is received.

6.4 Tracking

Every active legal hold is recorded in the records register maintained by the Clerk. The register records the date of issue, the scope of records affected, the matter to which it relates and the date of release.

6.5 Releasing a hold

Only the Clerk may release a legal hold, and only after confirming with the municipal solicitor that the legal proceeding or risk has concluded. On release, the Clerk updates the records register and notifies affected record owners and the IT function. Records whose scheduled disposition date has passed during the hold become eligible for disposition immediately on release, subject to the normal disposition process in Section 7.

7. Disposition

7.1 Eligibility

A record is eligible for disposition when all of the following are true:

- a) Its retention period has expired.
- b) No legal hold applies to it.
- c) No approved exception extends its retention.
- d) The record owner has confirmed eligibility.

7.2 Secure destruction

Records containing personal information, confidential information or information classified as Restricted or above under the Data Classification and Handling Standard must be destroyed in a manner that makes recovery impossible. Paper records must be cross-cut shredded or destroyed by a contracted secure-destruction service. Electronic records must be overwritten, degaussed or cryptographically erased in a manner appropriate to the storage medium. The method used must be recorded in the disposition record.

7.3 Disposition records

A disposition record must be created for every batch of records disposed of. The disposition record must state:

- a) The record class and description of records disposed of.
- b) The retention period that applied.
- c) The date of disposition.
- d) The method of destruction or transfer.
- e) The name and role of the record owner who confirmed eligibility.

Disposition records are themselves records subject to this policy. The retention period for disposition records is set by the Town's records retention by-law. Until the by-law assigns a period, the Director of Corporate Services must set an interim period and record it in the

records inventory; a period of seven years is offered as a starting point and is not derived from any cited control.

7.4 Backups

Backup copies of records are subject to the same retention and disposition requirements as the primary record. A backup that contains records past their retention period must be purged of those records, or the backup must be destroyed and replaced, on a cycle set by the Director of Corporate Services and recorded in the records inventory. The Director of Corporate Services has not yet set this cycle; a cycle aligned to the shortest retention period in the backup set is offered as a starting point and is not derived from any cited control.

7.5 No premature disposal

No record may be disposed of before its retention period has expired. Any premature disposal must be reported to the Director of Corporate Services and the Clerk as a control failure and recorded in the control failure log described in Section 11.

8. Application to Structured Data, Documents, Messages and Backups

This policy applies to records in all formats and storage types:

- a) **Structured data** — Records held in databases, case management systems or service request platforms are subject to the retention period of the record class they contain. The record owner is accountable for ensuring that the system's data lifecycle settings reflect the applicable period.
- b) **Documents and files** — Records held in file shares, document management systems or the municipal office are subject to the retention period of the record class. Record owners must ensure that storage locations are mapped in the records inventory.
- c) **Messages** — Emails, instant messages and other communications that constitute a record under the definition in Section 3 must be captured and retained as records. Communications that are transitory and carry no evidential or business value are not records and need not be retained beyond their immediate use. The Clerk, in consultation with the Director of Corporate Services, determines which message types constitute records for each business function.
- d) **Backups** — As set out in Section 7.4.

e) **AI-generated outputs** — Records produced by or with the assistance of AI tools used by the Town are subject to this policy in the same way as any other record. The AI Governance and Accountability Policy and the AI Acceptable Use Policy govern the use of those tools; this policy governs the records they produce.

9. Third-Party and Supplier Obligations

9.1 Contractual requirements

Every contract under which a third party holds or processes Town records must require the supplier to:

- a) Retain records for the period specified by the Town.
- b) Comply with any legal hold notice issued by the Clerk within a timeframe set by the Town and stated in the contract. The Town has not yet set a standard contractual timeframe for hold compliance; the Director of Corporate Services must set this and record it in the contract template before new contracts are executed.
- c) Destroy or return records at the end of the contract or at the end of the applicable retention period, whichever is earlier, and provide a written confirmation of destruction.
- d) Permit the Town to audit compliance with these requirements.

9.2 Oversight

The Director of Corporate Services is accountable for ensuring that supplier contracts include the requirements in Section 9.1. Supplier compliance is reviewed as part of the third-party oversight process governed by the Third-Party Risk Management Policy.

9.3 Cloud storage

Records held in the Town's Azure Canada Central environment are subject to this policy. The IT function must ensure that data lifecycle and deletion settings in that environment are configured to reflect the retention periods in the records inventory. No Town record may be stored in a location outside Canada.

10. Exceptions

10.1 Requesting an exception

A record owner who requires a record to be retained beyond its scheduled period for a documented business, legal or regulatory reason must submit a written exception request to the Director of Corporate Services. The request must state the record class, the reason for extended retention, and the proposed extended period.

10.2 Review and recording

The Director of Corporate Services reviews exception requests and records the outcome in the records inventory. Exceptions that extend retention beyond the scheduled period by more than one year must also be noted to the Clerk.

10.3 Expiry of exceptions

Every exception carries an expiry date. On that date, the record owner must either dispose of the records or submit a further exception request. Exceptions that have passed their expiry date without renewal or disposition are a control failure and must be reported under Section 11. The number of approved exceptions past their expiry date is a metric tracked under Section 11.

11. Metrics, Monitoring and Control Failures

11.1 Metrics

The Director of Corporate Services tracks the following metrics and reports them to the Chief Administrative Officer on a cycle set by the Chief Administrative Officer. Annual reporting is offered as a starting point and is not derived from any cited control.

- a) Number of record classes with an approved retention schedule in the by-law or records inventory.
- b) Number and percentage of expired records disposed of within the scheduled disposition window.
- c) Percentage of required schedule and repository reviews completed on time.
- d) Number of approved exceptions past their expiry date.
- e) Number of material control failures and the number of overdue corrective actions arising from them.

11.2 Control failures

A material control failure includes: premature disposal of records, failure to issue or honour a legal hold, disposal of records subject to an active hold, and failure to complete a required review. Every material control failure must be recorded in the control failure log, investigated by the Director of Corporate Services, and assigned a corrective action with a target completion date. The Chief Administrative Officer must be notified of any material control failure within a timeframe set by the Chief Administrative Officer and recorded in the Town's incident escalation guidance. The Town has not yet set this timeframe; two business days is offered as a starting point and is not derived from any cited control.

11.3 Audit

The records management programme is subject to internal audit on a cycle set by the Chief Administrative Officer. The Director of Corporate Services must make the records inventory, disposition records, legal hold register and exception log available to auditors on request.

12. Schedule and Repository Reviews

12.1 Annual review

The Director of Corporate Services conducts a review of the retention schedule and all records repositories annually. The review must assess whether:

- a) The retention periods in the by-law remain consistent with applicable provincial schedules and any changes in the Town's legal or regulatory obligations.
- b) All active record classes are mapped in the records inventory.
- c) Storage locations, including cloud environments and supplier systems, are accurately recorded.
- d) Record owners are correctly assigned.

The review is documented and the record of review is retained in the records inventory.

12.2 Triggered reviews

A review of the affected record classes and repositories must also be conducted when:

- a) The Town's records retention by-law is amended.
- b) A new statutory or regulatory obligation is identified that affects record-keeping.

- c) A significant change in business function, system or supplier occurs.
- d) A material control failure reveals a gap in the schedule or a repository.

The Director of Corporate Services initiates triggered reviews and records their completion.

12.3 Privacy alignment

The annual review must be coordinated with the Clerk to ensure that retention periods for records containing personal information remain consistent with the Town's obligations under applicable Ontario privacy law and the Privacy and Personal Information Policy.

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13. Roles and Accountabilities

Chief Administrative Officer — Holds ultimate accountability for the Town's records management programme. Reviews and endorses this policy annually. Receives reports on metrics and material control failures.

Director of Corporate Services — Owns this policy. Maintains the records inventory. Conducts annual and triggered reviews. Reviews exception requests. Reports metrics and control failures to the Chief Administrative Officer. Ensures supplier contracts include the requirements in Section 9.

Clerk — Issues and releases legal holds. Maintains the legal hold register. Acts as the access and privacy contact for access-to-information requests. Advises on retention periods for council records and access-to-information records. Coordinates with the Director of Corporate Services on privacy alignment.

Record owners — Accountable for records in their assigned class. Confirm disposition eligibility. Report control failures to the Director of Corporate Services. Participate in annual and triggered reviews.

IT function — Preserves affected systems on receipt of a legal hold. Ensures data lifecycle settings in the Azure Canada Central environment reflect the records inventory. Supports secure electronic destruction.

All employees and council members — Create and capture records in accordance with this policy. Do not dispose of records outside the authorised disposition process. Report suspected premature disposal or hold violations to their record owner or the Director of Corporate Services.

14. Relationship to Other Instruments

This policy operates within the Town's broader governance framework. The following instruments are directly related:

- **Information Security Policy** — Governs the security controls that protect records during their retention period.
- **Data Classification and Handling Standard** — Sets the classification levels that determine the destruction method required at disposition.

- **Privacy and Personal Information Policy** — Governs the handling of personal information throughout its lifecycle, including retention and disposal.
- **Third-Party Risk Management Policy** — Governs the oversight of suppliers who hold Town records.
- **Access Control Policy** — Governs who may access records during their retention period.
- **AI Governance and Accountability Policy** and **AI Acceptable Use Policy** — Govern the use of AI tools whose outputs may constitute records subject to this policy.

This policy does not duplicate the requirements of those instruments. Where a conflict appears, the Director of Corporate Services and the relevant policy owner must resolve it and document the outcome.

15. Review and Maintenance of This Policy

The Director of Corporate Services reviews this policy annually and submits any proposed amendments to the Chief Administrative Officer. The Chief Administrative Officer's review of this policy is recorded in the policy register.

A triggered review of this policy must be conducted when a change in law, a material control failure or a significant change in the Town's operations makes a provision of this policy inadequate or inconsistent with the Town's obligations.

The version history of this policy, including the date of each review and the name of the reviewer, is maintained in the policy register.

16. Compliance and Consequences

Compliance with this policy is mandatory for all persons within its scope. Failure to comply may result in disciplinary action under the Town's human resources policies, up to and including termination of employment or contract. Wilful destruction of records subject to a legal hold may also carry consequences under applicable law.

This policy is advisory as a governance instrument. The Town should obtain guidance from the municipal solicitor on specific obligations arising from applicable Ontario law.

Owner review items

The drafting process identified the following in the supplied answers. Resolve each before customer release.

Type	Detail	Where
gap	The customer confirmed that retention periods are set by the Town's records retention by-law and applicable provincial schedule, but did not supply the actual periods for any record class. The retention schedule table in Section 5.2 therefore cannot carry specific durations. The Director of Corporate Services must populate the records inventory with the current by-law periods before this policy is operationally effective.	Section 5.2 — Retention Schedule
gap	The retention period for disposition records is not supplied by the customer or by any cited framework material. Section 7.3 offers seven years as a starting point, clearly labelled as not derived from any cited control. The Director of Corporate Services must confirm the correct period against the by-law or seek a formal determination.	Section 7.3 — Disposition records
gap	The backup purge cycle is not set by the customer or by any cited framework material. Section 7.4 offers a starting point. The Director of Corporate Services must set and record this cycle in the records inventory.	Section 7.4 — Backups
gap	The contractual timeframe within which suppliers must comply with a legal hold notice is not set. Section 9.1 flags this as a parameter the Director of Corporate Services must set before new contracts are executed.	Section 9.1 — Contractual requirements
gap	The reporting cycle for metrics to the Chief Administrative Officer is not set. Section 11.1 offers annual reporting as a starting point. The Chief Administrative Officer must confirm the cycle.	Section 11.1 — Metrics
gap	The timeframe for notifying the Chief Administrative Officer of a material control failure is not set. Section 11.2 offers two business days as a starting point. The Chief Administrative Officer must set and record this in the Town's incident escalation guidance.	Section 11.2 — Control failures
gap	The internal audit cycle for the records management programme is not set. Section 11.3 flags this as a parameter the Chief Administrative Officer must set.	Section 11.3 — Audit
gap	The customer's locations are listed as 'Not specified'. The policy assumes all records are held in the municipal office or in Azure Canada Central, consistent with the customer's answer that no resident data is held outside Canada. If additional physical locations exist, the records inventory and Section 2 must be updated to reflect them.	Section 2 — Scope
vague	The customer's existing documents include a Privacy and Personal Information Policy. Section 12.3 requires coordination between the annual records review and that policy. The text of that policy is not available to this drafting agent, so this policy cannot assert what it requires. The Director of Corporate Services must reconcile the retention periods for personal information records against whatever that policy commits to.	Section 12.3 — Privacy alignment
vague	The customer states that records subject to access-to-information obligations are identified separately. This policy does not reproduce that identification. The Clerk must	Section 5.2 — Retention Schedule

	ensure the records inventory reflects the access-to-information designation for each applicable record class.	
gap	Ontario municipal records management is subject to applicable provincial legislation. This policy does not name specific statutes because the supplied material does not contain them and naming statutes without their text risks incomplete enumeration. The Town's reviewers should confirm which provincial instruments govern municipal records retention and disposal obligations, and whether any sector-specific schedules apply to the record classes in Section 5.2.	Section 5 — Retention Schedule and Section 12.3 — Privacy alignment

Information the organization must supply

These values were not available from the intake and are required before this document can operate:

- The specific retention periods for each record class in Section 5.2, drawn from the Town's records retention by-law and applicable provincial schedules, so that the records inventory can be populated with testable values.
- The retention period for disposition records, confirmed against the by-law or by formal determination from the Clerk and municipal solicitor. Seven years is offered as a starting point in Section 7.3 and is not a requirement.
- The backup purge cycle, set by the Director of Corporate Services and recorded in the records inventory. Section 7.4 offers a starting-point approach.
- The contractual timeframe within which suppliers must comply with a legal hold notice, to be set by the Director of Corporate Services and included in the standard contract template before new contracts are executed.
- The reporting cycle for metrics from the Director of Corporate Services to the Chief Administrative Officer. Annual is offered as a starting point in Section 11.1.
- The timeframe for notifying the Chief Administrative Officer of a material control failure, to be set by the Chief Administrative Officer and recorded in the Town's incident escalation guidance. Two business days is offered as a starting point in Section 11.2.
- The internal audit cycle for the records management programme, to be set by the Chief Administrative Officer.
- Confirmation of all physical and digital locations where Town records are held, so that Section 2 and the records inventory accurately reflect the full scope.
- Review by the municipal solicitor to confirm which provincial statutes and schedules govern the Town's records retention and disposal obligations, and to confirm that the

retention periods in the by-law satisfy those obligations for each record class.

- Reconciliation of the retention periods for personal information records against the commitments in the Privacy and Personal Information Policy, to be completed by the Director of Corporate Services and the Clerk before this policy takes effect.
- Confirmation that the access-to-information designation for each applicable record class is reflected in the records inventory, as referenced in the customer's answer about separately identified records.

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