

Responsible Recordkeeping Directive

A large, light blue watermark of the Toronto City logo is centered on the page. It features a stylized skyline of the city's buildings above the word "TORONTO" in a bold, sans-serif font.

Policy No.: CIMS-D001

Version No.: 2.2

Issued By: City Clerk's Office

Approval Date: February 11, 2026

Issued On: February 26, 2026

Subject: records management

Keywords: information management, records, recordkeeping, privacy, service delivery

Foreword

City of Toronto Information Management Policies and Standards are the official publication on the policies, standards, directives, guidelines, position papers, and preferred practices given oversight under delegated authority of [Toronto Municipal Code, Chapter 217, Records, Corporate \(City\)](#). These publications support the City's responsibilities for coordinating standardization of Information Management in the City of Toronto.

Revision History:

Version #	Version Date	Issued By	Changes in Document
1.0	March 2012	Corporate Information Management Services	
1.1	July 14, 2025	Corporate Information Management Services	Contact information updated, references updated, grammar and formatting updated
2.2	2026	Corporate Information Management Services	Updated introduction to align with the Information Management Accountability Policy, updated existing directive statements and references to align with existing legislation, added new directives for accessibility, availability, awareness, equity and inclusion, and consultation to align with updates to Toronto Municipal Code, TMC Chapter 217 and CIMS' policies, assigned each directive statement a guiding principle to support application.

Contact Information:

Kristie Pratt
Deputy City Clerk
 Corporate Information Management Services
 City Clerk's Office
 City Hall, 13th Floor, West Tower
 100 Queen Street West
 Toronto ON M5H 2N2
 416-392-9683

Introduction

Information collected, created and used by the City of Toronto is a corporate resource. Ensuring that this information is accurate, usable, secure, and accessible supports an open, transparent, and accountable local government, while improving customer service and program delivery. City records are documented information that is created or collected during City business, administration, or service delivery, and can be stored in any medium, including in physical, printed form, on film, or by electronic means. City records may consist of, but are not limited to, documents, financial statements, minutes, accounts, correspondence, memoranda, completed forms and application, reports, briefing notes, plans, maps, drawings, structured data, video, audio recordings, and photographs.

The City Clerk's Office is responsible for developing corporate information management policies and coordinating how City staff manage records in compliance with legislative requirements. Division Heads are accountable for the proper management and safeguarding of records, data, and information collected and created by their Division during program and service development, planning, and delivery. Division Head accountabilities include the application of policy and legislative requirements for the management of City business records.

Purpose

This Directive provides guidance for Division Heads and director-level staff to assess existing recordkeeping practices and consider revisions, as necessary, to manage records throughout their lifecycle. Customer service standards and an open, transparent government depend upon timely, accurate, and accessible records of business activities and decisions.

Directive

1. **Authority:** Division Heads are responsible and accountable for managing City records in the custody and control of their Division in accordance with established recordkeeping principles, policies, and legislation. Division Heads may delegate authority for recordkeeping duties and obligations to their staff, provided the delegation is documented in writing and the delegate has the skills and knowledge necessary to effectively exercise the authority.

[*Toronto Municipal Code Chapter 217*](#)

[*City of Toronto Act, 2006*](#)

2. **Ownership:** Division Heads shall manage records as corporate assets that belong to the City, and maintain the authenticity, reliability, integrity, and usability

of the records. Division Heads are responsible for making and enforcing decisions related to the creation, use, retention, and disposition of their Division's records.

[Toronto Municipal Code Chapter 217-3 A](#)

- 3. Privacy:** Division Heads must protect personal information, personal health information (if applicable), and confidential information in their custody and control from unauthorized access, use, and disclosure. Division Heads are accountable for the legislative compliant collection and use of personal information, personal health information (if applicable), and confidential information in the custody and control of their Division by City staff, as well as by third parties who are contracted by the Division to provide services on behalf of the City.

[Municipal Freedom of Information and Protection of Privacy Act 1990 \(MFIPPA\)](#)

[Toronto Municipal Code Chapter 217-3 E \(3\)](#)

[Personal Health Information Protection Act 2004 \(PHIPA\)](#)

- 4. Awareness:** Division Heads must ensure divisional staff, volunteers, and third-party vendors and contractors working on behalf of the Division are aware of records management and privacy practices, responsibilities, and expectations established in the corporate policies and standards developed by the City Clerk's Office. Division Heads are accountable for ensuring their staff, volunteers, and third-party vendors take required privacy and information management training.

[Toronto Municipal Code Chapter 217-3 A](#)

- 5. Duty to Document:** Division Heads are accountable for documenting operational, financial, legal, audit, and other activities that demonstrate how they conduct the Division's services and programs, regardless of the format in which records are created or stored.

[Toronto Municipal Code Chapter 217-3 E \(1\)](#)

- 6. Safeguards:** Division Heads are responsible consulting with Corporate Information Management Services and Toronto Cyber Security to ensure necessary physical and cyber security protection are applied to records under

their custody and control to prevent inadvertent or unauthorized destruction, damage, and disclosure.

[Toronto Municipal Code Chapter 217-3 E \(3\) \(4\)](#)

[MFIPPA \(Regulation 823, s.3\)](#)

[PHIPA \(s.12\) \(s.13\)](#)

- 7. Availability and Accessibility:** Division Heads must make records available in a timely and appropriate manner, either through proactive publication, routine disclosure, Freedom of Information requests, or as open data, subject to the requirements of MFIPPA, PHIPA, and other relevant legislation and City policies.

In addition, Division Heads shall ensure compliance with accessibility legislation, standards, and policies by providing oversight and resources to prevent and remove accessibility barriers in the creation, storage, and provision of records and information.

[Toronto Municipal Code, Chapter 217-3 E \(2\)](#)

[City of Toronto Act, 2006, section 200\(1\)](#)

[Accessibility for Ontarians with Disabilities Act, 2005](#)

[MFIPPA](#)

[PHIPA](#)

- 8. Retention and Disposition:** Division Heads must manage records in their custody and control in compliance with the City's Records Retention By-laws. Division Heads are responsible for ensuring records are classified according to the City's Records Retention Schedule and maintained for as long as necessary to meet legislative and business requirements. City business records require Division Head and Deputy City Clerk authorization for disposition. Disposition may result in transferring custody of records with archival disposition to the City of Toronto Archives for ongoing preservation and access or destroying business records that do not have ongoing historical or informational value. Transitory records should be destroyed when they no longer required for administrative activities.

[Toronto Municipal Code Chapter 217-3 E \(4\)](#)

[City of Toronto Act 2006, section 201\(1\)](#)

9. **Consultation and Assessment:** Division Heads must consult with the City Clerk's Office's Corporate Information Management Services (CIMS) when procuring, designing, and implementing programs, services, projects, or technology tools that will create, collect, or manage records, to ensure privacy and information management requirements are embedded by design.

[*Toronto Municipal Code Chapter 217-3 B*](#)

10. **Equity and Inclusion:** Division Heads shall promote and apply principles of equity and inclusion through applicable strategies, frameworks, data equity capacity building, and engagement with diverse and equity-deserving communities. The development, collection, analysis, reporting, and use of demographic information and data must inform and optimize programs, services, and policies, and maximize benefits for First Nations, Inuit, and Métis, Black, and other equity-deserving groups.

[*Toronto City Council Report, 2020.EX18.6*](#)

[*City of Toronto Reconciliation Action Plan*](#)

References

Legislation

- [City of Toronto Act](#)
- [Toronto Municipal Code Chapter 217, Records, Corporate \(City\)](#)
- [Toronto Municipal Code Chapter 217, Records, Corporate \(City\), Schedule A, Record Retention Schedule](#)
- [Municipal Freedom of Information and Protection of Privacy Act \(MFIPPA\)](#)
- [Personal Health Information Protection Act \(PHIPA\)](#)
- [Accessibility for Ontarians with Disabilities Act \(AODA\)](#)

Policy

- [Information Management Accountability Policy](#)
- [Information and Data Governance Policy](#)
- [Protection of Privacy Policy](#)
- [Privacy Impact Assessment Policy](#)
- Acceptable Use Policy

Other

- [Copyright Act](#)
- [Toronto City Council Report, 2020.EX18.6 Toronto City Council Report, 2020.EX18.6 - Data for Equity Strategy: Supporting Equitable Services, Equity Priorities, Performance Measurement and Accountability](#)
- [City of Toronto 2022-2032 Reconciliation Action Plan](#)
- [Digital Infrastructure Strategic Framework](#)