

Content Management Policy

Version 1.0

Approved by: Minister, Service Alberta	Owner: Assistant Deputy Minister, Data, Information and Privacy Services Division	
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Contact: SA.InformationManagement@gov.ab.ca	Policy Instrument type: Policy	

1. Approval

This Policy is approved by the Minister of Service Alberta under the authority of the *Government Organization Act* and the Records Management Regulation.

Original signed by
Nate Glubish
Minister of Service Alberta

Date Approved

March 24, 2022

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2. Effective Date

2.1 The Content Management Policy takes effect on March 24, 2022.

3. Authority

- 3.1 This policy is issued under the authority of the *Government Organization Act* and the Records Management Regulation.
- 3.2 Service Alberta has the authority to establish, maintain, and promote the enterprise (i.e., Government of Alberta wide) policies, standards, and procedures for the creation, handling, control, organization, retention, maintenance, security, preservation, disposition, alienation, and destruction of records in the custody and/or under the control of a Government of Alberta department or departments.

4. Scope

- 4.1 This policy applies to all departments defined under section 14 of Schedule 11 of the *Government Organization Act* and agencies, boards and commissions designated in Schedule 1 of the [Freedom of Information and Protection of Privacy Regulation](#).
- 4.2 Agencies, boards and commissions that are not designated in Schedule 1 of the Freedom of Information and Protection of Privacy Regulation are encouraged to align with this policy.
- 4.3 This policy applies to all content (i.e., records, information, data) in the custody and/or under the control of a Government of Alberta department (or departments), regardless of format, state and/or classification (e.g., official, transitory, active, semi-active, inactive, open, closed, etc.).
- 4.4 Information subject to the *Health Information Act* (HIA) must be managed in compliance with the HIA; the HIA is paramount to this policy.

5. Context

The Records Management Regulation requires the Minister of Service Alberta to establish a records management program for the Government of Alberta. “Record” has the meaning given to it in the *Freedom of Information and Protection of Privacy Act* (FOIP Act).

NOTE: For the purposes of the Government of Alberta’s records management program, “content” is the commonly used and operational interpretation of the term “record”.

Content encompasses all records, data and/or information, regardless of format, state and/or classification.

6. Definitions

Definitions to be used in the interpretation and implementation of this policy are in Appendix A. These definitions are intended to delineate the scope of meaning for terms with multiple ordinary meanings, industry-specific meanings and/or personal interpretations.

7. Policy Statement

- 7.1 This policy states the requirements to which departments will adhere when managing content.
- 7.2 This policy and supporting policy instruments are intended to:
- enhance process efficiency;
 - support program and service delivery;
 - improve ability to meet evidentiary and regulatory requirements;
 - safeguard against risks such as unauthorized access, collection, use, disclosure, or destruction/loss of sensitive (e.g., personal or health) content;
 - ensure the right content is available to the right person, in the right format, at the right time; and
 - clarify roles and responsibilities to facilitate accountability, transparency, and collaboration.

8. Policy Requirements

General

- 8.1 Service Alberta has the legislated authority for establishing enterprise content management requirements (e.g., rules, obligations, definitions, etc.) and policy instruments.
- 8.2 Enterprise content management requirements are specified in policy instruments that include (but are not limited to):
- acts;
 - regulations;
 - policies;
 - directives;
 - standards;
 - procedures/operational policies;
 - records retention and disposition schedules; and
 - guidance (e.g., guidelines, checklists, etc.).
- 8.3 The deputy head of a department is designated as the information controller and information custodian of a department's content.
- 8.3.1 Deputy heads can assign the roles of information controller and/or information custodian as required.
- 8.4 Content must be managed in accordance with the government's content management policy instruments (e.g., records retention and disposition schedules, Official and Transitory Records Directive, etc.) and applicable legislation.

8.5 Service Alberta is responsible for maintaining and monitoring a central repository of projects, applications, and products that interact with content in the custody and/or control of Government of Alberta departments. For greater clarity, this does not include agencies, boards and commissions.

8.5.1 Departments are obligated to update the central repository with any new projects, applications, and products upon implementation for compliance and monitoring purposes, in accordance with processes established by Service Alberta.

8.6 Service Alberta is responsible for maintaining and monitoring a central repository of content inventories for internal Government of Alberta departments . For greater clarity, this does not include agencies, boards and commissions.

8.6.1 A content inventory must be created and maintained for the content that is part of, or is affected by, a department's business processes (regardless of location, format, or state).

Additional governance bodies and roles

8.7 In addition to those established by existing legislation (e.g., Records Management Regulation) and this policy, Service Alberta may establish additional governance bodies/roles to oversee specific aspects of content management as required.

Records/Information Governance

8.8 As per the Records Management Regulation, the Alberta Records Management Committee (ARMC) is the legislated body responsible for evaluating the records (i.e., content) management program and providing advice to the Minister of Service Alberta regarding policies, standards and procedures for managing content.

8.9 Service Alberta is responsible for coordinating not only the enterprise advisory function (e.g. Information Management Portfolio Directors), but also specific advisory functions for the departments that will support the implementation and operation of content management requirements.

Data Governance

8.10 Service Alberta establishes the following governance bodies/roles for the management of data:

8.10.1 Data Governance Council

- Acts as the final approval body for data governance items escalated by the Chief Data and Privacy Officer.

8.10.2 Chief Data and Privacy Officer

- Approves enterprise data definitions and governance requirements, and is responsible for creating, maintaining, and promoting the Government of Alberta privacy framework.
- Maintains a central repository of projects, applications, and products that interact with content in the custody and/or under the control of the Government of Alberta departments.
- Maintains and monitors a central repository of content inventories that have been completed and validated by departments.

8.10.3 Data Secretariat

- Establishes and ensures accountability for service and/or commercial relationships leveraging data in the custody and/or under the control of the Government of Alberta.

Responsibilities

8.11 Deputy heads will:

- 8.11.1 ensure adherence to all applicable legislation mandating content management requirements;
- 8.11.2 assign the role of information controller/data executive and/or information custodian/data steward as required;
- 8.11.3 ensure that enterprise policy instruments for content management (including, but not limited to, privacy and security) are successfully implemented within their departments;
- 8.11.4 ensure the creation and maintenance of a content inventory for the department, if a Government of Alberta department;
- 8.11.5 ensure updates to the central repository of projects, applications, and products for the department, if a Government of Alberta department;
- 8.11.6 ensure content necessary for the delivery of common or integrated programs or services is shared across departments;
- 8.11.7 ensure content in the custody and/or under the control of their departments is used in an ethical manner;
- 8.11.8 champion digital as the primary means for capturing decisions and transactions, and ensure the management of digital content throughout the entire information management lifecycle;
- 8.11.9 ensure specific department responsibilities for data and privacy have been assigned and are performed in alignment with all applicable legislation and Service Alberta policy instruments;
- 8.11.10 ensure that decisions and transactions are captured and managed appropriately; accurate and complete capture consists of metadata, classification, and any other necessary details of a decision or transaction.
- 8.11.11 share accountability with other deputy heads for the management of content in an integrated system or shared service and/or application; and
- 8.11.12 ensure departmental participation in setting enterprise direction for managing content in the custody and/or control of the department.

8.12 Government of Alberta staff (which includes, but is not limited to, employees, contractors, volunteers, appointees, and interns) will:

- 8.12.1 adhere to the content management policy instruments developed by Service Alberta;
- 8.12.2 create, use, and manage content digitally when possible;
- 8.12.3 complete all relevant mandatory training (e.g., content management training, cyber security training, etc.);

- 8.12.4 protect sensitive (e.g., personal or health) content from risks such as unauthorized access, collection, use, disclosure, loss, damage, or destruction;
- 8.12.5 manage and dispose of content only in accordance with approved records retention schedules and the [Code of Conduct and Ethics for the Public Service of Alberta](#); and
- 8.12.6 manage and dispose of transitory content for which they are responsible in accordance with the [Transitory Records Retention Schedule](#) and the Code of Conduct and Ethics for the Public Service of Alberta.

9. Compliance

Consequences of non-compliance with this policy could result in the loss of information, damage to Government of Alberta's reputation, exposure of Albertans to harm and/or incurrence of unnecessary costs.

- 9.1 Depending on the severity of non-compliance, either informal or formal requests and/or follow-ups may be made by Data, Information and Privacy Services Division, Corporate Internal Audit Services, Justice and Solicitor General, Cybersecurity Services, Office of the Information Privacy Commissioner, Public Service Commission, and/or Office of the Auditor General.
- 9.2 Under the *Public Service Act*, legislated disciplinary action may be taken depending on the severity of non-compliance.

10. Supporting Resources

The following resources are available to assist departments in adhering to this policy:

- [Enterprise Information Management](#)
- [Government of Alberta Information Management and Technology \(IMT\) Policy Instruments](#)
- [Alberta Queen's Printer](#)
 - [Freedom of Information and Protection of Privacy Act](#)
 - [Government Organization Act](#)
 - [Health Information Act](#)
 - [Records Management Regulation](#)
 - [Public Service Act](#)

11. Review Date

This policy is to be reviewed for accuracy and relevancy every two years, and will be updated as required.

12. Contact Details

sa.informationmanagement@gov.ab.ca

Appendix A - Definitions

The definitions contained in this appendix are intended to support the interpretation and implementation of the Content Management Policy. These definitions are expanded upon in Service Alberta [content management policy instruments](#).

Access*: right, opportunity, means of finding, using or retrieving information.

(Source: ISO 15489-1:2016)

Classification*: systematic identification and/or arrangement of business activities and/or records into categories according to logically structured conventions, methods, and procedural rules.

(Source: ISO 15489-1:2016)

Data: Facts represented as text, numbers, graphics, images, sound or video. Data is the raw material used to represent information, or from which information can be derived.

(Source: DAMA Dictionary of Data Management)

Decision: a determination arrived at after consideration.

Department: as defined in the *Government Organization Act*.

Deputy Head: in respect of a department, means:

- the chief officer of the department, or
- if there is more than one chief officer of the department, the chief officer of that part of the department for which he or she is responsible.

(Source: Records Management Regulation)

Destruction*: process of eliminating or deleting a record, beyond any possible reconstruction.

(Source: ISO 15489-1:2016)

Disposition*: range of processes associated with implementing records retention, destruction or transfer decisions which are documented in disposition authorities [i.e., records retention and disposition schedules] or other instruments.

(Source: ISO 15489-1:2016)

Information: 1. [U]nderstanding concerning any objects such as facts, events, things, processes, or ideas, including concepts that, within a certain context and timeframe, have a particular meaning.

2. The interpretation of data based on its context, including:

- the business meaning of data elements and related terms,
- The format in which data is presented,

- The timeframe represented by the data, and
- The relevance of the data to a given usage.

(Source: DAMA Dictionary of Data Management)

Information Controllers: Information controllers have the responsibility and decision making authority for assigned collections of information, including (but not limited to) regulating and administering use, disclosure, and/or disposition of information.

(Source: [Information Controller and Information Custodian Directive](#))

Information Custodians: Information custodians have the responsibility for maintaining and/or administering the systems and/or applications in which content is managed without having responsibility for the information itself.

(Source: [Information Controller and Information Custodian Directive](#))

Record: a record of information in any form and includes notes, images, audiovisual recordings, x-rays, books, documents, maps, drawings, photographs, letters, vouchers and papers and any other information that is written, photographed, recorded or stored in any manner, but does not include software or any mechanism that produces records.

(Source: [Freedom of Information and Protection of Privacy Act](#))

Records retention and disposition schedule: a legal authority that describes the records under the control of a government department specifies how long and where they must be kept as they progress through the phases of their lifecycle, the format in which the records must be stored and what their final disposition will be (destruction or archival preservation) at the end of their lifecycle.

(Source: [Developing Records Retention and Disposition Schedules](#))

Transitory records: transitory records contain information in any format that is of temporary or limited usefulness. Transitory records may be used in the preparation of more complete records such as those that document actions, recommendations, opinions, decisions, approvals, or the creation and modification of policy instruments. However, transitory records are not relied on as evidence of government activities, events or transactions or to understand the delivery of programs or services.

(Source: [Official and Transitory Records Directive](#))

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**DAMA, Earley, S. (Eds.). The DAMA Data Dictionary of Data Management, Bradley Beach, NJ: Technics Publications, LLS. 2011.