Information Asset Register Policy

1. PURPOSE

The purpose of this Policy is to establish a framework for identifying, documenting, maintaining, and reviewing the Township of Armour's Information Asset Register.

The Information Asset Register replaces the former Personal Information Bank (PIB) inventory maintained under previous legislative requirements. It is maintained as an internal governance and administrative tool to support the responsible management, protection, and oversight of information held by the Township.

The Register supports, but does not replace, the Township's obligations under applicable legislation and municipal policies.

2. SCOPE

This Policy applies to all Township departments, boards, committees, employees, contractors, consultants, volunteers, and agents acting on behalf of the Township.

It applies to information created, collected, received, used, or maintained by the Township in any format, including paper records, electronic files, databases, and information systems.

3. DEFINITIONS

For the purposes of this Policy:

"Information Asset" means information or a collection of information created, collected, received, or maintained by the Township to support its programs, services, and operations.

"Information Asset Register" means an internal record identifying the Township's information assets and documenting relevant information about their purpose, responsible department, location, protection, and retention.

"Personal Information" means recorded information about an identifiable individual, as defined by applicable legislation.

"Clerk/Privacy Officer" means the employee designated to coordinate the Township's information management, privacy, and access to information responsibilities.

4. LEGISLATIVE AUTHORITY

This Policy is established pursuant to the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA) and shall be administered in accordance with applicable legislation,

regulations, municipal policies, records retention requirements, and guidance issued by the Information and Privacy Commissioner of Ontario.

Where legislation imposes more stringent privacy requirements, those requirements shall prevail.

5. RESPONSIBILITIES

5.1 Council

Council shall approve this Policy and any amendments.

5.2 Chief Administrative Officer

The Chief Administrative Officer shall oversee the implementation of this Policy and promote compliance throughout the organization.

5.3 Clerk/Privacy Officer

The Clerk/Privacy Officer shall:

a) coordinate the maintenance and review of the Register;
b) provide guidance to departments on information management and privacy requirements;
c) coordinate updates with Department Heads; and
d) recommend improvements and corrective actions where necessary.

5.4 Department Heads

Department Heads shall:

a) identify information assets within their departments;
b) provide accurate information for the Register;
c) notify the Clerk/Privacy Officer of new information assets or significant changes; and
d) ensure information is managed in accordance with applicable legislation and Township policies.

6. INFORMATION ASSET REGISTER

The Register may be maintained in an electronic database, spreadsheet, or other approved format. The Register shall be maintained separately from this Policy. The database and its entries do not form part of the Policy and may be updated as required without Council approval, provided the updates remain consistent with this Policy. The Register shall be reviewed at least annually and updated as necessary.

7. PRIVACY AND INFORMATION SECURITY

Departments shall ensure that information, particularly personal information, is collected, used, disclosed, stored, and protected in accordance with applicable legislation and Township policies.

Only information reasonably necessary for an authorized purpose shall be collected, and appropriate safeguards shall be used to protect information against unauthorized access, use, disclosure, loss, or destruction.

Where a new program, technology, or information system may create significant privacy or security risks, the Clerk/Privacy Officer may require an appropriate assessment before implementation.

8. RECORDS RETENTION AND DISPOSAL

Information assets shall be retained and disposed of in accordance with the Township's Records Retention By-law, applicable legislation, and other relevant requirements.

Inclusion in the Register does not independently authorize the destruction of records or establish a retention period.

9. REVIEW

This Policy shall be reviewed by the Clerk at least once during each term of Council or sooner where legislative, technological, or operational changes require review.

10. EFFECTIVE DATE

This policy comes into effect on the date approved by Council.