

ADMINISTRATIVE PROCEDURES

CITY OF BURLINGAME

October 6, 2025

SUBJECT: Records Management Policy

Section 1 - Purpose

The purpose of this policy is to define the requirements for managing the records of the City of Burlingame (the "City") in a cost effective and efficient manner, and in compliance with laws, regulations, and operational requirements.

Section 2 - Policy

It is the policy of the City that:

1. Records created or received in the course or conduct of the City's business are assets of the City and are the exclusive property of the City.
 - a. Records are subject to compliance with this policy, the associated Retention Schedule, and City procedures.
 - b. Employees should have no expectation of privacy for any record or writing created during the performance of City business or while using a system for managing the City's records and information. This includes records created or received on City-issued devices and records created or received on personal devices that relate to City business.
2. Employees are responsible for being responsive to requests for public records in compliance with the California Public Records Act.
3. Each department is responsible for maintaining its records in accordance with this policy. Records will be created, stored, and managed with the appropriate classification that enables their protection as well as necessary access for future use.
4. Records are to be retained in accordance with the City's approved Retention Schedule.
5. The following are not necessary or convenient to the discharge of City duties and therefore should not be retained in the ordinary course of business: notes, drafts, non-City materials, reference materials, and duplicate copies.
6. Records, whether active or inactive, are to be appropriately stored and protected per the **City of Burlingame's Procedures for Managing Records**.
7. Vital Records are to be identified by the City in a manner that establishes the priority of recovery of the records in a timely manner following a disaster. This process of identifying and inventorying Vital Records is outlined in the City's Procedures for Managing Records.
8. Certain records that are deemed valuable for documenting the City's history shall be designated as Historical Records and may be preserved beyond the Retention Schedule to ensure their ongoing availability and access.
9. Digital backups are duplicates of records retained elsewhere and are used for disaster recovery purposes. Thus, digital backups are not subject to the requirements of the Retention Schedule.
10. When records complete their retention period, regardless of their format, they shall be deleted, erased, or destroyed in compliance with Resolution 084-2018 and other applicable City procedures.

11. Maintenance of City records in a trusted electronic system, as identified by the City, is the preferred method of storage for official City records. Such electronic records should be indexed and full-text searchable.
12. Regardless of the format in which a communication is generated or received, including electronic mail (email), postal mail, or any other written format, the record must be retained in accordance with the City's Records Retention Schedule. This includes communications relating to City business that are necessary or convenient to the discharge of City duties and that are sent or received on personal devices and personal accounts.

Section 3 - Scope

This policy shall apply to all City employees, temporary workers, and contractors of the City who have access to, or use of, City records. If there is a conflict between the requirements of this policy or the procedures implementing the policy on the one hand, and a department's policy on the other hand, the more restrictive shall apply, unless compliance with the more restrictive requirement would conflict with State law.

Section 4 - Definitions (in alphabetical order)

1. **Classification:** The systematic identification and arrangement of records and information into categories according to logically structured conventions, methods, and procedural rules. Also known as Indexing.
2. **Inactive Record:** Any record related to closed, completed, or concluded activities. Inactive records are no longer routinely referenced but must be retained in order to fulfill legal, operational, or other retention requirements.
3. **Legal Hold:** A procedure to cease destruction of certain records or information, even if the Records Retention Schedule mandates destruction, when litigation or government investigation related to those records is pending, imminent, or, in some cases, foreseeable.
4. **Non-Record:** Documents, studies, books, and pamphlets produced by outside agencies, and preliminary drafts not retained in the ordinary course of business.
5. **Office of Record:** The department that keeps the original or "record copy." Usually it is the department that originates the record, unless the item is for a City Council meeting (then it is the City Clerk.)
6. **Record:** A "record" is a thing that constitutes an objective lasting indication of a writing, event, or other information, is in the custody of a City staff member, and is kept either (1) because a law requires it to be kept, or (2) because it is necessary or convenient to the discharge of the staff member's duties.
 - a. **Active Record:** A record needed to perform current operations, subject to frequent use and usually located on site.
 - b. **Historical Record:** Records documenting the history and significant milestones of the City as per the Records Retention Schedule.
 - c. **Duplicate Record:** Unofficial copies of documents kept only for convenience or reference, working papers, appointment logs, stocks of publications and processed documents, and library or museum material intended solely for reference or exhibition. Also, documents such as rough notes, calculations, or drafts assembled or created and used in the preparation or analysis of other documents.
 - d. **Vital Records:** Records that are fundamental to the functioning of an organization and necessary to continue operations without delay under abnormal conditions or in the event of a disaster.

7. **Retention Period:** The length of time a record must be retained to fulfill its administrative, fiscal, and/or legal function.
8. **Transitory Records:** Records not retained in the ordinary course of business: preliminary drafts, notes, or interagency or intra-agency memoranda and records having only transitory value. Examples: telephone messages, meeting room reservation schedules, logs, source records entered into a computer system that qualifies as a “trusted system”, etc.

Section 5 - Responsibility

1. Office of Record

- a. The group, department, or office in the organization responsible for ownership of specified records for the full duration of the Records Retention Period.
- b. The Office of Record is responsible for declaring records obsolete in accordance with the Records Retention Schedule.

2. City Attorney

- a. Determines when a Legal Hold is necessary for records and information relevant to litigation, an investigation, or an audit and informs affected Departments.
- b. Works with the City Clerk to approve the destruction of obsolete records that have completed their retention period.
- c. Works with the City Clerk to update the Records Retention Schedule as needed.

3. City Clerk

- a. Works with the City Attorney to approve the destruction of obsolete records that have completed their retention period on the City’s Records Retention Schedule.
- b. Designates the Office of Record for various classes of records.
- c. Serves as the City’s official Custodian of Records and administers and provides oversight to the City’s records and information management program.
- d. Will facilitate, in consultation with the City Attorney, the update of the Records Retention Schedule as needed.
- e. Has the authority to decide which records, media, and information constitute “Historic Records.”
- f. Orchestrates regularly scheduled records clean-up days.

4. Department Head

- a. May authorize the destruction of duplicate records under his or her control that are no longer required.
- b. Designates a records coordinator within the department. In the event that a records coordinator is not named, this responsibility will default to the Department Head.

5. Supervisor or Manager

- a. Is responsible, when an employee, temporary employee, or contractor leaves the City, for complying with the requirements of this policy and any supporting procedures for retaining and managing the records of the exiting employee, temporary employee, or contractor.

6. Department Records Coordinator

- a. Shall be designated by the Department Head.

- b. Maintains records in accordance with this policy.
- c. Works with the City Clerk to schedule and oversee records clean-up days.
- d. Identify records to destroy based on the City's Records Retention Schedule.
- e. Is responsible for implementing the procedures within their department.
- f. Serves as a resource to department staff on matters related to records retention.

7. Employee

- a. Complies with the California Public Records Act.
- b. Follows the City's Records Retention Schedule.
- c. Seeks guidance from their Department Head to determine the applicability of this policy and which electronic records to retain.
- d. Complies with the [Electronic Communication Usage Policy \(Formerly Email and Internet Policy\)](#)
- e. Complies with the [Communications Equipment Use Policy \(Formerly Cell Phone and Device Use Policy\)](#)
- f. Routinely reviews electronic content and deletes content for which retention is not required.

Section 6 - References

- 1. City of Burlingame Records Retention Schedule
- 2. City of Burlingame Procedures for Managing Records

Who to Contact Regarding this Policy

City Clerk

Approval

This policy is approved by Resolution Number XXX-2025.