



Personal Information Banks

The Municipal Freedom of Information and Protection of Privacy Act (“M.F.I.P.P.A.”) requires the City of Oshawa to keep a list of updated Personal Information Banks and to make it available for the public to view. City Clerk Services must prepare and make available an index of Personal Information Banks by referring to the requirements of M.F.I.P.P.A., in conjunction with the Records Retention By-Law.

Personal Information Banks are defined in M.F.I.P.P.A. as “a collection of personal information that is organized and capable of being retrieved using an individual’s name or an identifying number or particular assigned to the individual.”

Under section 34(1) of M.F.I.P.P.A., a Personal Information Bank must contain the following elements:

- a) Its name and location;
- b) The legal authority for its establishment;
- c) The types of Personal Information maintained in it;
- d) How the Personal Information is used;
- e) To whom the Personal Information is disclosed;
- f) The categories of individuals about whom Personal Information is maintained; and,
- g) The policies applicable to the Retention and disposal of the Personal Information.

The Personal Information Banks listed in this document refer to specific sections of the definition of Personal Information contained in the M.F.I.P.P.A. The definition is as follows:

“Personal Information” means recorded information about an identifiable individual, including,

- a) Information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual,
- b) Information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,
- c) Any identifying number, symbol or other particular assigned to the individual,
- d) The address, telephone number, fingerprints or blood type of the individual,
- e) The personal opinions or views of the individual except if they relate to another individual,

- f) Correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence,
- g) The views or opinions of another individual about the individual, and
- h) The individual's name if it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual

This document contains a complete listing of the City's Personal Information Banks organized by Function and Sub-Function in accordance with the Records Retention By-law. Please refer to the following pages for descriptions of the City's current Personal Information Banks.

If you have questions please contact the City's Information, Access and Privacy Officer at 905-436-3311 or foi@oshawa.ca

Function:

Oversight

Sub-Function:

Decision-making - Council

Type of Personal Information:

Sections (d), (e) and (h)

Category of Individuals in Bank:

Individuals submitting correspondence

Uses:

The conclusive and authoritative determination of a course of action, by an authorized City of Oshawa Council Committee or Senior Staff member. Includes: The work of bodies such as Sub-Committees', 'Working Groups' etc.

Council Committees are Accessibility Advisory Committee, Committee of Adjustment, Heritage Advisory Committee (Heritage Oshawa), Environmental Advisory Committee, Finance Committee, Corporate Services Committee, Community Services Committee, Oshawa Animal Care Advisory Committee, Oshawa Active Transportation Committee, Development Services Committee, etc.

Users:

City Clerk Services, Mayor and Members of Council and Committees

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25; Canada Labour Code (R.S.C., 1985, c. L-2) 135.1(9)
Limitation: Canada Labour Code (R.S.C., 1985, c. L-2) 149(4)

Retention Period:

End of calendar year plus 10 years

Function:

Election Management

Sub-Function:

Candidate Nomination

Type of Personal Information:

Sections (d) and (h)

Category of Individuals in Bank:

Candidates for elections

Uses:

Where candidates have specified qualifications, the formal determination that individuals shall be included on ballots. Includes notification to candidates that their nominations have been received, as well as the withdrawal of nominations upon request of a candidate.

Users:

City Clerk Services

Legal Authority:

Municipal Elections Act, 1996, S.O. 1996, c. 32, Sched. s. 88(2); 2009, c. 33, Sched. 21, s. 8(50)

Retention Period:

Closure plus 120 days

Function:

Election Management

Sub-Function:

Population

Type of Personal Information:

Sections (c), (d) and (h)

Category of Individuals in Bank:

Electors in the City of Oshawa

Uses:

Receiving of a preliminary Voters List from M.P.A.C. and its uploading into a City of Oshawa database.

Users:

City Clerk Services

Legal Authority:

Municipal Elections Act, 1996, S.O. 1996, c. 32, Sched. s. 88(2); 2009, c. 33, Sched. 21, s. 8(50)

Retention Period:

Closure plus 120 days

Function:

Election Management

Sub-Function:

Notification

Type of Personal Information:

Sections (d) and (h)

Category of Individuals in Bank:

Electors in the City of Oshawa

Uses:

Providing election-related information to eligible voters, including the times and dates when voting will occur, locations of voting, manner of voting, etc.

Users:

City Clerk Services

Legal Authority:

Municipal Elections Act, 1996, S.O. 1996, c. 32, Sched. s. 88(2); 2009, c. 33, Sched. 21, s. 8(50)

Retention Period:

Closure plus 120 days

Function:

Election Management

Sub-Function:

Voting

Type of Personal Information:

Sections (a), (c), (d), (e) and (h)

Category of Individuals in Bank:

Electors in the City of Oshawa

Uses:

Following presentation of proof of identity at a designating location of voting, marking of a ballot by an eligible voter, maintaining secrecy, and depositing it into a ballot box.

Users:

City Clerk Services

Legal Authority:

Municipal Elections Act, 1996, S.O. 1996, c. 32, Sched. s. 88(2); 2009, c. 33, Sched. 21, s. 8(50)

Retention Period:

Closure plus 120 days

Function:

Council Support

Sub-Function:

Correspondence Management

Type of Personal Information:

Sections (d), (e) and (h)

Category of Individuals in Bank:

Individuals submitting correspondence

Uses:

Interaction between Council Members and City of Oshawa Employees regarding an issue or matter, often precipitated by correspondence from stakeholders. Including requests for flag raising and for proclamations. Excluding the undocumented forwarding, upon reception, of correspondence addressed to the Council Member and any reply correspondence addressed to the Council Member's constituents.

Users:

City Clerk Services, Mayor and Members of Council

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

End of calendar year plus 10 years

Function:

Council Support

Sub-Function:

Meeting Management

Type of Personal Information:

Sections (d), (e) and (h)

Category of Individuals in Bank:

Individuals submitting correspondence and making delegations or presentations

Uses:

The initial and all subsequent regular and ad hoc meetings of City Council to consider, debate and render decisions regarding all matters referred by the City of Oshawa.

Users:

City Clerk Services, Mayor and Members of Council

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

End of calendar year plus six years

Function:

Legal Services

Sub-Function:

Registration Land Transactions

Type of Personal Information:

Sections (b), (c), (d) and (h)

Category of Individuals in Bank:

Property sellers and buyers

Uses:

Conduct of legal elements of transactions affecting the ownership of land in the City of Oshawa.

Users:

Legal Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Closure plus two years

Function:

Legal Services

Sub-Function:

Collection

Type of Personal Information:

Sections (b), (c), (d) and (h)

Category of Individuals in Bank:

Individuals going to collections

Uses:

Legal efforts to recover amounts owed to the City, excluding the collection of property taxes.

Users:

Legal Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Closure plus two years

Function:

Legal Services

Sub-Function:

Prosecution

Type of Personal Information:

Sections (a), (b), (c), (d) and (h)

Category of Individuals in Bank:

Individuals involved in a legal matter with the City

Uses:

Legal enforcement of the City of Oshawa's Corporate Policy Framework in Provincial Offences Court. For example, By-laws regulating noise, grading of land, parking, the Fire Code, etc.

Users:

Legal Services

Legal Authority:

Provincial Offences Act, R.S.O. 1990, c. P.33

Retention Period:

Closure plus two years

Function:

Legal Services

Sub-Function:

Litigation

Type of Personal Information:

Sections (a), (b), (c), (d) and (h)

Category of Individuals in Bank:

Individuals involved in a legal matter with the City

Uses:

Protection of the integrity of the City of Oshawa, in all administrative and operational matters not resolved by 'Collection' and 'Prosecution,' whether cases proceed to court or are settled in an alternative manner, where the City of Oshawa is the plaintiff, the defendant or has intervener status. Excluding the arbitration of complaints under collective agreements.

Users:

Legal Services

Legal Authority:

Supreme Court Civil Rules, under the Court Rules Act, B.C.R. 168/2009, ss. 23.3 (7), (8), (9)

Retention Period:

Closure plus two years

Function:

Finance Services

Sub-Function:

Payroll Management

Type of Personal Information:

Sections (b), (c) and (h)

Category of Individuals in Bank:

Employees

Uses:

In interaction with Human Resource Management, ensuring that amounts payable to City of Oshawa employees are identified, validated, entered, and disbursed, in accordance with relevant policy instruments.

Users:

Finance Services

Legal Authority:

Canada Business Corporations Act (R.S.C., 1985, c. C-44) subsection (2); Canada Labour Standards Regulations (C.R.C., c. 986) under the Canada Labour Code 24(2); Canada Pension Plan (R.S.C., 1985, c. C-8) 24(1); Limitation: Canada Business Corporations Act (R.S.C., 1985, c. C-44) 252(2)

Retention Period:

End of fiscal year plus six years

Function:

Finance Services

Sub-Function:

Baselining

Type of Personal Information:

Sections (b), (c), (d) and (h)

Category of Individuals in Bank:

Property owners

Uses:

The maintenance of updated and accurate data regarding properties, in particular their ownership, mortgage holder, severances, consolidations, legal descriptions, whether they make payments in lieu of taxes, and other fundamental information identifying and describing a property having a roll number.

Users:

Taxation Services

Legal Authority:

Municipal Act 340 (1) 2001, c. 25, s. 340 (1)

Retention Period:

End of fiscal year plus six years

Function:

Finance Services

Sub-Function:

Taxation

Type of Personal Information:

Sections (b), (c), (d) and (h)

Category of Individuals in Bank:

Property owners

Uses:

The collection of property taxes from residential and commercial property owners, involving assessment and re-assessment following improvements to land assets by M.P.A.C., calculation of tax amounts, billing, clarification, adjustment, reception of payment, and collection efforts.

Users:

Taxation Services

Legal Authority:

Municipal Act 340 (1) 2001, c. 25, s. 340 (1)

Retention Period:

End of fiscal year plus six years

Function:

Finance Services

Sub-Function:

Tax Sale Registration

Type of Personal Information:

Sections (b), (c), (d) and (h)

Category of Individuals in Bank:

Property owners

Uses:

Where collection of overdue taxes is ineffective, a lengthy process leading either to collection of the taxes overdue from the owner or to the collection of taxes from the proceeds of the imposed sale of the property for which taxes are due.

Users:

Taxation Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Closure plus 10 years

Function:

Finance Services

Sub-Function:

Accounts Receivable

Type of Personal Information:

Sections (b), (c), (d) and (h)

Category of Individuals in Bank:

External stakeholders

Uses:

The receipt of revenue from external stakeholders.

Users:

Finance Services

Legal Authority:

Canada Business Corporations Act (R.S.C., 1985, c. C-44) subsection (2); Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

End of fiscal year plus six years

Function:

Finance Services

Sub-Function:

Accounts Payable

Type of Personal Information:

Sections (b), (c), (d) and (h)

Category of Individuals in Bank:

Employees and external stakeholders

Uses:

Ensuring that a variety of types of accounts payable transactions are received, validated, entered into ledger and paid, in accordance with relevant corporate policy instruments, and that overall authorities and budgets are not exceeded. Including disbursement of amounts arising from expense claims by employees.

Users:

Finance Services

Legal Authority:

Canada Business Corporations Act (R.S.C., 1985, c. C-44) subsection (2); Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

End of fiscal year plus six years

Function:

Finance Services

Sub-Function:

Claims Administration

Type of Personal Information:

Sections (a), (b), (c), (d) and (h)

Category of Individuals in Bank:

Individuals who initiate a claim with the City

Uses:

Handling of claims against the City of Oshawa insurance policies, in instances where, either a stakeholder or an employee has been injured at a City facility.

Users:

Finance Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Closure plus two years

Function:

Finance Services

Sub-Function:

Certification

Type of Personal Information:

Sections (b), (c), (d) and (h)

Category of Individuals in Bank:

Property owners

Uses:

Response to requests from lawyers and property owners, verifying taxation-related specifics.

Users:

Taxation Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

End of fiscal year plus two years

Function:

Finance Services

Sub-Function:

Request Handling

Type of Personal Information:

Sections (b), (c), (d), (f) and (h)

Category of Individuals in Bank:

External stakeholders

Uses:

Response to requests for clarification and explanation of any financial matter involving the City of Oshawa from external stakeholders.

Users:

Finance Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

End of fiscal year plus two years

Function:

Human Resource Management

Sub-Function:

Employee Engagement

Type of Personal Information:

Sections (b), (c) and (h)

Category of Individuals in Bank:

Employees

Uses:

Interaction with employees and business units, often by written survey, to ascertain their level of satisfaction with their work environment and their suitability for the specific role that they occupy, ensuring that the work culture at the City of Oshawa continuously improves.

Users:

Human Resource Services

Legal Authority:

Employment Standards Act, 2000, S.O. 2000, c. 41; Occupational Health and Safety Act, R.S.O. 1990, c. O.1

Retention Period:

End of calendar year plus six years

Function:

Human Resource Management

Sub-Function:

Organizational Development

Type of Personal Information:

Sections (b), (c), (e), (g) and (h)

Category of Individuals in Bank:

Employees

Uses:

Work to improve performance, culture, relationships between teams, relationships between individuals and leaders, using change management techniques.

Users:

Human Resource Services

Legal Authority:

Employment Standards Act, 2000, S.O. 2000, c. 41; Occupational Health and Safety Act, R.S.O. 1990, c. O.1

Retention Period:

Closure plus 10 years

Function:

Human Resource Management

Sub-Function:

Recruitment

Type of Personal Information:

Sections (b), (c), (d), (g) and (h)

Category of Individuals in Bank:

Employees and individuals applying for employment at the City of Oshawa

Uses:

Hiring individuals, as employees who are best able to fulfill the requirements of specific City of Oshawa positions. Including, working with the relevant manager to specify needs and to locate niche sources of skilled personnel, resolution of conventional complaints regarding the outcome of a recruitment case, and conduct of security checks.

Users:

Human Resource Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Closure plus two years

Function:

Human Resource Management

Sub-Function:

Talent Management

Type of Personal Information:

Sections (b), (c), (e), (g) and (h)

Category of Individuals in Bank:

Employees

Uses:

The determination of learning needs of employees so that they may better fulfill current and anticipated future positions.

Users:

Human Resource Services

Legal Authority:

Canada Occupational Health and Safety Regulations (SOR/86-304) under the Canada Labour Code 17.8(1) section 17.7; 17.5(1)(c)(b)(2) subsection (1)

Retention Period:

Termination of employment plus six years

Function:

Human Resource Management

Sub-Function:

Program Management

Type of Personal Information:

Sections (b), (c), (e), (g) and (h)

Category of Individuals in Bank:

Employees

Uses:

Efforts intended to respond to particular issues, sometimes as required by legislation or by the City of Oshawa policy framework, specifying overarching objectives, priorities, methods, etc., whereby employees seek or are proactively offered targeted information, guidance, compensation, reimbursement, accommodation or another benefit.

Users:

Human Resource Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Closure plus six years

Function:

Human Resource Management

Sub-Function:

Supervision

Type of Personal Information:

Sections (b), (c), (e), (g) and (h)

Category of Individuals in Bank:

Employees

Uses:

The deployment and management of employees, while documenting any events that may affect their career with the City of Oshawa and their subsequent eligibility for post-termination benefits in what was formerly called an "Employee File."

Users:

Human Resource Services

Legal Authority:

Canada Labour Code (R.S.C., 1985, c. L-2) 252(2) 264(a); Limitation Canada Labour Code (R.S.C., 1985, c. L-2) 149(4); Canada Labour Code (R.S.C., 1985, c. L-2) 257(2)

Retention Period:

Termination of employment plus six years

Function:

Human Resource Management

Sub-Function:

Compensation

Type of Personal Information:

Sections (b), (c), (d) and (h)

Category of Individuals in Bank:

Employees

Uses:

The design and delivery of a fair and competitive suite of rewards, in interaction with a service provider, compensating employees for their work at the City of Oshawa while also providing support to them in particular professional and personal circumstances, often as required by legislation. Including, setting the base salary of a position and the annual review of salaries, and the calculation of other amounts applicable to eligible employees holding particular positions.

Users:

Human Resource Services

Legal Authority:

Canada Labour Code (R.S.C., 1985, c. L-2) 257(2); Limitation Canada Pension Plan (R.S.C., 1985, c. C-8) 22(3) notwithstanding subsection (1) or (2); Canada Pension Plan (R.S.C., 1985, c. C-8) 90(2); Workplace Safety and Insurance Act, 1997, S.O. 1997, c. 16, Schedule A: 80 (1) 1997, c. 16, Sched. A, s. 80(2) 2001, c. 9, Sched. I, s. 4 (2)

Retention Period:

Termination of reward plus 50 years

Function:

Human Resource Management

Sub-Function:

Labour Relations

Type of Personal Information:

Sections (a), (b), (c), (e), (g) and (h)

Category of Individuals in Bank:

Employees

Uses:

Negotiating with unions and bargaining units to establish collective agreements and other agreements ensuring the equitable and effective performance of City of Oshawa functions, regular meetings with these unions and bargaining units, and management of grievances raised under collective agreement

Users:

Human Resource Services

Legal Authority:

Canada Human Rights Act (R.S.C., 1985, c. H-6) 60(5); Labour Relations Act, 1995, S.O. 1995, c. 1, Sched. A; Collective Agreements

Retention Period:

Termination of collective agreement plus 15 years

Function:

Human Resource Management

Sub-Function:

Complaint Handling

Type of Personal Information:

Sections (b), (c), (e), (g) and (h)

Category of Individuals in Bank:

Employees

Uses:

Response to formal assertion of wrongdoing, involving receipt of a request, logging its arrival and characteristics, notification of affected business units and identification or collection of responsive evidence, review of this evidence, referral of finding to appropriate authorities for action, and eventual closure of the case.

Users:

Human Resource Services

Legal Authority:

Canada Human Rights Act (R.S.C., 1985, c. H-6) 60(5); Labour Relations Act, 1995, S.O. 1995, c. 1, Sched. A; Collective Agreements; Employment Standards Act, 2000, S.O. 2000, c. 41; Occupational Health and Safety Act, R.S.O. 1990, c. O.1

Retention Period:

Closure plus six years

Function:

Human Resource Management

Sub-Function:

Incident Management – Occupational Health and Safety

Type of Personal Information:

Sections (b), (c), (e), (g) and (h)

Category of Individuals in Bank:

Employees

Uses:

Response to injuries and other Occupational Health and Safety problems occurring in the workplace, involving the notification of provincial authorities, local and collaborative (with Occupational Health and Safety authorities) investigations.

Users:

Human Resource Services

Legal Authority:

Canada Occupational Health and Safety Regulations (SOR/86-304) under the Canada Labour Code 16.13(1); Occupational Health and Safety Act, R.S.O. 1990, c. O.1

Retention Period:

End of calendar year plus six years

Function:

Information Technology Management

Sub-Function:

Cyber-Incident Management

Type of Personal Information:

Sections (a), (b), (c), (d), (e), (f), (g) and (h)

Category of Individuals in Bank:

Employees and residents

Uses:

Based on pre-established impact criteria, the identification of and response to I.T. asset-specific or more comprehensive incidents, ranging from password compromise to global cyber attacks and ransomware attacks, affecting many or all City of Oshawa employees, the delivery of services, or the reputation of the City, involving the Cyber Security Management Team.

Users:

Information Technology Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

End of calendar year plus 10 years

Function:

Corporate Communications

Sub-Function:

Content Management

Type of Personal Information:

Sections (a), (d) and (h)

Category of Individuals in Bank:

External stakeholders

Uses:

Work to develop and maintain records, including images, video, art elements, and other artifacts, that may be re-used or incorporated into other records in the future.

Users:

Corporate Communications

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Superseded plus two years

Function:

Corporate Communications

Sub-Function:

Stakeholder Management

Type of Personal Information:

Sections (d) and (h)

Category of Individuals in Bank:

External stakeholders

Uses:

Entering into agreement with, gathering information about, understanding and maintaining contact with stakeholder types and particular stakeholders in anticipation of, and to facilitate, other functions.

Users:

Corporate Communications

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Termination of relationship plus six years

Function:

Corporate Communications

Sub-Function:

Engagement

Type of Personal Information:

Sections (d) and (h)

Category of Individuals in Bank:

External stakeholders

Uses:

Interaction with targeted stakeholders to solicit and obtain input into City of Oshawa corporate plans, programs, initiatives and specific issues that arise from time to time, regardless of medium and venue.

Users:

Corporate Communications

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Closure plus six years

Function:

Records and Information Management

Sub-Function:

Privacy Complaint Management

Type of Personal Information:

Sections (a), (b), (c), (d), (e), (f), (g) and (h)

Category of Individuals in Bank:

Individuals who have opened a privacy complaint with the Information and Privacy Commissioner of Ontario

Uses:

Response to formal complaint cases brought to the Information and Privacy Commissioner of Ontario regarding or involving the City of Oshawa.

Users:

City Clerk Services

Legal Authority:

Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. M.56

Retention Period:

Closure plus two years

Function:

Records and Information Management

Sub-Function:

Privacy Breach Management

Type of Personal Information:

Sections (a), (b), (c), (d), (e), (f), (g) and (h)

Category of Individuals in Bank:

Individuals who have been the subject of a privacy breach at the City of Oshawa

Uses:

Response to recognition that personal information in the care and control of the City of Oshawa has been collected, used, disclosed or retained in contravention of the Municipal Freedom of Information and Protection of Privacy Act.

Users:

City Clerk Services

Legal Authority:

Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. M.56

Retention Period:

Resolution plus 10 years

Function:

Records and Information Management

Sub-Function:

Access Request Management

Type of Personal Information:

Sections (a), (b), (c), (d), (e), (f), (g) and (h)

Category of Individuals in Bank:

Requesters

Uses:

Response to formal requests for copies of City of Oshawa records, or to correct or release personal information contained within those records. Including facilitating the appeal process with the Information and Privacy Commissioner of Ontario, and responding to consultation requests from external institutions to whom a request has been directed.

Users:

City Clerk Services

Legal Authority:

Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. M.56

Retention Period:

Closure plus two years

Function:

Corporate Security Management

Sub-Function:

Monitoring

Type of Personal Information:

Sections (a), (b) and (c)

Category of Individuals in Bank:

Employees and visitors to City facilities

Uses:

Verification of the condition, utilization, and operating environment of an infrastructure or facility asset, ensuring that the expectations established in security-related policy instruments are being respected at the City of Oshawa. Including, video surveillance systems and footage.

Users:

Facilities Management Services and contracted security services, as applicable

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

15 days

Function:

Corporate Security Management

Sub-Function:

Incident Management

Type of Personal Information:

Sections (a), (b), (c), (d), (e), (f), (g) and (h)

Category of Individuals in Bank:

Employees and visitors to City facilities

Uses:

Upon recognition that a deviation from the expectations established in security related policy instruments has occurred, threatening City of Oshawa functions, or the lives, health, property or security of employees or stakeholders, the implementation of plans leading to the reduction and elimination of adverse impacts. For example, cases of theft, vandalism, assault, medical occurrence, fire, etc.

Users:

Facilities Management Services and contracted security services, as applicable

Legal Authority:

Canada Occupational Health and Safety Regulations (SOR/86-304) under the Canada Labour Code 16.13(1); Occupational Health and Safety Act, R.S.O. 1990, c. O.1; Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Closure plus six years

Function:

Corporate Security Management

Sub-Function:

Investigation

Type of Personal Information:

Sections (a), (b), (c), (d), (e), (f), (g) and (h)

Category of Individuals in Bank:

Employees and visitors to City facilities

Uses:

Work to determine the underlying cause an incident, a series of incidents, or any other matter of concern.

Users:

Facilities Management Services and contracted security services, as applicable

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Closure plus 10 years

Function:

Customer Service

Sub-Function:

Registration

Type of Personal Information:

Sections (c), (d) and (h)

Category of Individuals in Bank:

Customers utilizing online City services

Uses:

Documentation of identifying information regarding a customer, facilitating online access to City of Oshawa functions.

Users:

Service Oshawa

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

De-registration of customer plus 10 years

Function:

Customer Service

Sub-Function:

Customer Support

Type of Personal Information:

Sections (b), (c), (d), (e), (f) and (h)

Category of Individuals in Bank:

Customers contacting Service Oshawa

Uses:

Responsive interaction with customers to provide explanations, clarification and other information assistance regarding City of Oshawa functions or to coordinate their participation in or request for delivery of a City of Oshawa function. Including the initiation of response to reported potholes, documentation and direction of complaints, registration in programs (for example, snow clearing, provision of application forms, scheduling of meetings, performance of marriages, etc.).

Users:

Service Oshawa

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Closure plus 10 years

Function:

Land Asset Management

Sub-Function:

Acquisition

Type of Personal Information:

Sections (b), (c), (d) and (h)

Category of Individuals in Bank:

Property owners

Uses:

The purchase, foreclosure, donation, exchange or expropriation of land assets from the province or from private owners.

Users:

Planning Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Disposition of land asset

Function:

Land Asset Management

Sub-Function:

Registration

Type of Personal Information:

Sections (c), (d) and (h)

Category of Individuals in Bank:

Property owners

Uses:

When a new land asset is acquired, work with the G.I.S. group to ensure that the City of Oshawa databases are correctly updated.

Users:

Planning Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Disposition of land asset

Function:

Land Asset Management

Sub-Function:

Corporate Real Estate Management

Type of Personal Information:

Sections (b), (c), (d) and (h)

Category of Individuals in Bank:

Property owners

Uses:

Overall legal life cycle management of managing City of Oshawa owned land assets.

Users:

Planning Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Termination of agreement plus six years

Function:

Land Asset Management

Sub-Function:

Development

Type of Personal Information:

Sections (b), (c), (d) and (h)

Category of Individuals in Bank:

Property owners

Uses:

The review of subdivision, building and other proposals submitted by private and commercial property owners and by the City of Oshawa itself, as well as interaction with and support from other business units responsible for the day-to-day use of the affected land assets.

Users:

Planning Services

Legal Authority:

Planning Act, R.S.O. 1990, c. P.13, 14.2, (6); Section 253 of the Municipal Act, 2001 1994, c. 23, s. 8; 2002, c. 17, Sched. B, s. 3

Retention Period:

Closure plus 50 years

Function:

Licensing

Sub-Function:

Application Management

Type of Personal Information:

Section (b), (c), (d) and (h)

Category of Individuals in Bank:

Applicants

Uses:

The management of applications for licenses to engage in regulated activity within the City of Oshawa. Including businesses, lottery, taxis, housing, pets, restaurants, second-hand dealers, payday loan establishments, etc.

Users:

Municipal Law Enforcement and Licensing Services (M.L.E.L.S.)

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25; Business Licensing By-law 120-2005; Group Home Registration By-law 78-2006; Lodging Houses By-law 94-2002; Taxicab Licensing By-law 50-2003; Two Unit House Registration By-law 41-2001

Retention Period:

End of term of license plus 15 years

Function:

Licensing

Sub-Function:

Inspection

Type of Personal Information:

Sections (b), (c), (d), (g) and (h)

Category of Individuals in Bank:

Applicants and property owners

Uses:

Verification of compliance with the terms of a license to engage in a regulated activity, usually accomplished at the site of the activity. Including lodging houses, two-unit houses, group homes, pool enclosures, residential rental housing, second hand dealers, public garages, salvage yards, taxis, etc.

Users:

Municipal Law Enforcement and Licensing Services (M.L.E.L.S.)

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25; Business Licensing By-law 120-2005; Group Home Registration By-law 78-2006; Lodging Houses By-law 94-2002; Taxicab Licensing By-law 50-2003; Two Unit House Registration By-law 41-2001

Retention Period:

End of term of license plus 15 years

Function:

Licensing

Sub-Function:

Investigation

Type of Personal Information:

Sections (b), (c), (d), (g) and (h)

Category of Individuals in Bank:

Applicants and property owners

Uses:

Work to determine whether an apparent or reported non-compliance with the terms of a license or permit has occurred.

Users:

Municipal Law Enforcement and Licensing Services (M.L.E.L.S.)

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25; Business Licensing By-law 120-2005; Group Home Registration By-law 78-2006; Lodging Houses By-law 94-2002; Taxicab Licensing By-law 50-2003; Two Unit House Registration By-law 41-2001

Retention Period:

Closure plus six years

Function:

Licensing

Sub-Function:

Suspension

Type of Personal Information:

Sections (b), (c), (d), (g) and (h)

Category of Individuals in Bank:

Applicants and property owners

Uses:

The temporary or permanent withdrawal of the privileges accorded by a license or permit.

Users:

Municipal Law Enforcement and Licensing Services (M.L.E.L.S.)

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25; Business Licensing By-law 120-2005; Group Home Registration By-law 78-2006; Lodging Houses By-law 94-2002; Taxicab Licensing By-law 50-2003; Two Unit House Registration By-law 41-2001

Retention Period:

Closure plus six years

Function:

Infrastructure Asset Management

Sub-Function:

Permitting

Type of Personal Information:

Sections (c), (d) and (h)

Category of Individuals in Bank:

Applicants and property owners

Uses:

The review of proposals submitted by private and commercial property owners and by other stakeholders, as well as interaction with and support from other business units responsible for the day-to-day use of the affected land assets. Including municipal consents, alteration permits, pool installation permits, sub-division applications, etc.

Users:

Engineering Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25; Building Code Act, 1992, S.O. 1992, c. 23

Retention Period:

Closure plus two years

Function:

Infrastructure Asset Operations

Sub-Function:

Maintenance

Type of Personal Information:

Sections (c), (d) and (h)

Category of Individuals in Bank:

Property owners

Uses:

The planned and scheduled or the unplanned repair, replacement or treatment of an infrastructure asset to ensure its continued operation or to return it to operation, and/or to ensure its optimal reliability, availability and maintainability. Including street sweeping, pothole repair, shoulder and boulevard maintenance, sidewalk maintenance, catch basin cleaning, creek and storm pond maintenance, litter abatement, posting and removing signage, road closures, winter control operations, salting and plowing roads and sidewalks, windrow cleaning for seniors and people with disabilities, etc.

Users:

Operations Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

End of calendar year plus 10 years

Function:

Infrastructure Asset Operations

Sub-Function:

Program Management

Type of Personal Information:

Sections (c), (d) and (h)

Category of Individuals in Bank:

Property owners

Uses:

Efforts intended to respond to particular issues, sometimes as required by legislation or by the City of Oshawa policy framework, specifying overarching objectives, priorities and methods. Including anti-idling, pitch-in programs, use of bio-diesel, anti-littering, air quality, waste reduction, quality of life, beautification, street planters and hanging baskets, street trees, forestry programs, horticulture programs, memorial benches, animal services, etc.

Users:

Operations Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Closure of program plus six years

Function:

Building Services

Sub-Function:

Inquiry Management

Type of Personal Information:

Sections (c), (d), (e) and (h)

Category of Individuals in Bank:

Requesters and property owners

Uses:

Responsive interaction with stakeholders, to provide explanations, clarification and other assistance regarding properties. Including consideration of location, intended use, by-laws, etc.

Users:

Building Permit and Inspection Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

End of calendar year plus two years

Function:

Building Services

Sub-Function:

Permitting

Type of Personal Information:

Sections (c), (d) and (h)

Category of Individuals in Bank:

Property owners

Uses:

The review of a variety of applications for permits to engage in regulated activity within the City of Oshawa. Including permitting for temporary signage, demolition, change of use, septic, structural, mechanical, plumbing, etc.

Users:

Building Permit and Inspection Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25; Building Code Act, 1992, S.O. 1992, c. 23; Limitations Act, 2002, S.O. 2002, c. 24, Sched. B(2) 2002, c. 24, Sched. B, s. 15 (2)

Retention Period:

Closure plus 15 years

Function:

Building Services

Sub-Function:

Inspection

Type of Personal Information:

Sections (b), (c), (d) and (h)

Category of Individuals in Bank:

Property owners

Uses:

Verification of compliance with the terms of a permit to engage in a regulated activity, usually accomplished at the site of the activity. Including inspections relating to fire alarms and other fire code requirements.

Users:

Building Permit and Inspection Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25; Building Code Act, 1992, S.O. 1992, c. 23; Property Standards By-law 1-2002; Limitations Act, 2002, S.O. 2002, c. 24, Sched. B(2) 2002, c. 24, Sched. B, s. 15 (2)

Retention Period:

Closure plus 15 years

Function:

Building Services

Sub-Function:

Complaint Management

Type of Personal Information:

Sections (b), (c), (d), (e) and (h)

Category of Individuals in Bank:

Property owners

Uses:

Methodical response to observation or formal assertion of wrongdoing, involving receipt of a complaint, validating its source, notification of affected external authorities where appropriate, collection of responsive evidence, review of this evidence, referral of findings to appropriate authorities for action, and eventual closure of the case.

Users:

Building Permit and Inspection Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25; Building Code Act, 1992, S.O. 1992, c. 23; Property Standards By-law 1-2002

Retention Period:

End of calendar year plus six years

Function:

Senior Community Centre Services

Sub-Function:

Program Management

Type of Personal Information:

Sections (a), (b), (c), (d) and (h)

Category of Individuals in Bank:

Members

Uses:

Efforts intended to respond to particular issues, sometimes as required by legislation or by the City of Oshawa policy framework, specifying overarching objectives, priorities, methods, etc. Including leisure, community support, recreation, special events, continuing education, food services, adult day program, foot care, transportation, computer lab, peer mentoring, physiotherapy, exercise and fall prevention, etc.

Users:

Oshawa Senior Community Centres

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Closure of program plus two years

Function:

Senior Community Centre Services

Sub-Function:

Registration

Type of Personal Information:

Sections (a), (b), (c), (d) and (h)

Category of Individuals in Bank:

Members

Uses:

Review and acceptance of applications from members to participate in particular programs offered by the Oshawa Senior Community Centres.

Users:

Oshawa Senior Community Centres

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

End of calendar year plus two years

Function:

Senior Community Centre Services

Sub-Function:

Fundraising

Type of Personal Information:

Sections (b), (c) and (h)

Category of Individuals in Bank:

Donors

Uses:

Coordination of a series of inter-related events and releases, having the common goal of generating revenue with which to fund the programs of the Oshawa Senior Community Centres.

Users:

Oshawa Senior Community Centres

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

End of calendar year plus six years

Function:

Senior Community Centre Services

Sub-Function:

Volunteer Management

Type of Personal Information:

Sections (b), (c), (d), (e) and (h)

Category of Individuals in Bank:

Volunteers

Uses:

The engagement, deployment and management of volunteers, who deliver elements of Oshawa Senior Community Centres programs, ensuring that they achieve performance objectives.

Users:

Oshawa Senior Community Centres

Legal Authority:

Employment Standards Act, 2000, S.O. 2000, c. 41; Occupational Health and Safety Act, R.S.O. 1990, c. O.1; Canada Labour Code (R.S.C., 1985, c. L-2) 149(4); Canada Labour Code (R.S.C., 1985, c. L-2) – 257(2)

Retention Period:

Termination of involvement plus six years

Function:

Senior Community Centre Services

Sub-Function:

Incident Management

Type of Personal Information:

Sections (a), (b), (c), (d) and (h)

Category of Individuals in Bank:

Members, volunteers and employees

Uses:

Upon recognition that an event has occurred, threatening City of Oshawa functions, or the lives, health, property, or security of employees or stakeholders, the implementation of plans leading to the reduction and elimination of adverse impacts. Including "slip and fall" cases, etc.

Users:

Oshawa Senior Community Centres

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25; Limitations Act, 2002, S.O. 2002, c. 24, Sched. B(2)

Retention Period:

Closure plus 15 years

Function:

Recreation and Culture Services

Sub-Function:

Stakeholder Management

Type of Personal Information:

Sections (d) and (h)

Category of Individuals in Bank:

External stakeholders

Uses:

Entering into agreement with, gathering information about, understanding, and maintaining contact with stakeholder types and particular stakeholders, in anticipation of and to facilitate other functions.

Users:

Recreation and Culture Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Termination of relationship plus six years

Function:

Recreation and Culture Services

Sub-Function:

Volunteer Management

Type of Personal Information:

Sections (b), (c), (d), (e) and (h)

Category of Individuals in Bank:

Volunteers

Uses:

The engagement, deployment and management of volunteers, who deliver elements of recreation and culture programs and who assist in other ways, ensuring that they achieve performance objectives.

Users:

Recreation and Culture Services

Legal Authority:

Employment Standards Act, 2000, S.O. 2000, c. 41; Occupational Health and Safety Act, R.S.O. 1990, c. O.1; Canada Labour Code (R.S.C., 1985, c. L-2) 149(4); Canada Labour Code (R.S.C., 1985, c. L-2) – 257(2)

Retention Period:

Termination of relationship plus two years

Function:

Recreation and Culture Services

Sub-Function:

Program Management

Type of Personal Information:

Sections (a), (b), (c), (d) and (h)

Category of Individuals in Bank:

Participants

Uses:

Efforts intended to respond to particular issues, sometimes as required by legislation or by the City of Oshawa policy framework, specifying overarching objectives, priorities, methods, etc. Including, Culture Counts, preservation of murals, fitness, aquatics, sports, camps, general interest, etc.

Users:

Recreation and Culture Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Closure of program plus six years

Function:

Recreation and Culture Services

Sub-Function:

Cemetery Operations

Type of Personal Information:

Sections (a), (b), (c), (d) and (h)

Category of Individuals in Bank:

Users

Uses:

Regular work ensuring the usability of a land asset (e.g. cemetery). Including interaction with users of a cemetery and supervision of any contractors charged with the maintenance and enhancements.

Users:

Recreation and Culture Services

Legal Authority:

O. Reg 30/11: GENERAL under Funeral, Burial and Cremation Services Act, 2002, S.O. 2002 c. 33; and 101. (1) O. Reg. 30/11, s. 101 (1)

Retention Period:

End of calendar year plus six years

Function:

Recreation and Culture Services

Sub-Function:

Cemetery Management

Type of Personal Information:

Sections (a), (b), (c), (d) and (h)

Category of Individuals in Bank:

Users

Uses:

Use of a land asset (e.g. cemetery) as a place of internment of City of Oshawa stakeholders.

Users:

Recreation and Culture Services

Legal Authority:

O. Reg 30/11: GENERAL under Funeral, Burial and Cremation Services Act, 2002, S.O. 2002 c. 33; and 101. (1) O. Reg. 30/11, s. 101 (1)

Retention Period:

End of calendar year plus six years

Function:

Compliance Management

Sub-Function:

Enforcement

Type of Personal Information:

Sections (a), (b), (c), (d), (e), (g) and (h)

Category of Individuals in Bank:

External stakeholders

Uses:

Action by By-law Officers to reduce the aggravation or repetition of a City of Oshawa By-law infraction by stakeholders.

Users:

Municipal Law Enforcement and Licensing Services (M.L.E.L.S.)

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25; Limitations Act, 2002, S.O. 2002, c. 24, Sched. B (2); Various City By-laws

Retention Period:

Closure plus six years

Function:

Compliance Management

Sub-Function:

Appeal Management

Type of Personal Information:

Sections (a), (b), (c), (d), (e), (g) and (h)

Category of Individuals in Bank:

Appellants

Uses:

Where a stakeholder is dissatisfied with the outcome of an enforcement case, work to convene a hearing in regard to the matter, resulting in the confirmation or withdrawal of the enforcement consequence.

Users:

Municipal Law Enforcement and Licensing Services (M.L.E.L.S.)

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25; Limitations Act, 2002, S.O. 2002, c. 24, Sched. B (2); Various City By-laws

Retention Period:

Closure plus six years

Function:

Protective Services

Sub-Function:

Staff Training

Type of Personal Information:

Sections (b), (c), (g) and (h)

Category of Individuals in Bank:

Employees

Uses:

The determination of learning requirements, sourcing or development of learning aids, the delivery of training, and post-delivery evaluation, thereby improving employee job-related performance.

Users:

Fire Services

Legal Authority:

Employment Standards Act, 2000, S.O. 2000, c. 41; Occupational Health and Safety Act, R.S.O. 1990, c. O.1; Canada Labour Code (R.S.C., 1985, c. L-2) 149(4); Canada Labour Code (R.S.C., 1985, c. L-2) 257(2)

Retention Period:

Termination of employment plus two years

Function:

Protective Services

Sub-Function:

Inspection

Type of Personal Information:

Sections (a), (b), (c), (d), (e), (g) and (h)

Category of Individuals in Bank:

Property owners

Uses:

Verification of compliance with the terms of a license or permit to engage in a regulated activity or with a By-law, usually accomplished at the site of the activity.

Users:

Fire Services

Legal Authority:

Fire Protection and Prevention Act, 1997, S.O. 1997, c. 4; Limitations Act, 2002, S.O. 2002, c. 24, Sched. B (2)

Retention Period:

End of calendar year (transfer key records to Building Services and Permitting)

Function:

Protective Services

Sub-Function:

Public Education

Type of Personal Information:

Sections (d) and (h)

Category of Individuals in Bank:

Participants

Uses:

Delivery of various forms of orientation and training to stakeholders to raise awareness of safety issues and mitigation techniques, seeking to avoid incidents.

Users:

Fire Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

End of calendar year plus two years

Function:

Protective Services

Sub-Function:

Suppression

Type of Personal Information:

Sections (a), (b), (c), (d) and (h)

Category of Individuals in Bank:

External stakeholders

Uses:

First response to incidents affecting health, safety and property. Including fires, medical assist, vehicle accidents, specialized rescues (e.g. water, confined space, technical rope, trench entrapment, hazardous materials, etc.)

Users:

Fire Services

Legal Authority:

Fire Protection and Prevention Act, 1997, S.O. 1997, c. 4; Limitations Act, 2002, S.O. 2002, c. 24, Sched. B (2)

Retention Period:

Closure plus 15 years

Function:

Innovation and Transformation

Sub-Function:

Program Management

Type of Personal Information:

Sections (a), (d), (e) and (h)

Category of Individuals in Bank:

External stakeholders

Uses:

Efforts intended to respond to particular issues, sometimes as required by legislation or by the City of Oshawa policy framework, specifying overarching objectives, priorities, methods, etc. Including accessibility, diversity and inclusion, and age friendly strategies.

Users:

Innovation and Transformation

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Superseded plus two years

Function:

Innovation and Transformation

Sub-Function:

Program Operations

Type of Personal Information:

Sections (a), (d), (e) and (h)

Category of Individuals in Bank:

External stakeholders

Uses:

Annual implementation of programs. Including accessibility, diversity and inclusion, and age friendly strategies.

Users:

Innovation and Transformation

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25; Limitations Act, 2002, S.O. 2002, c. 24, Sched. B (2)

Retention Period:

End of calendar year plus 15 years

Function:

Innovation and Transformation

Sub-Function:

Research Initiative Management

Type of Personal Information:

Sections (a), (b), (d), (e) and (h)

Category of Individuals in Bank:

External stakeholders

Uses:

Application of methodologies, with differing levels of formality, leading to the standardized, methodical and efficient study of scientific, sociological, economic and other principles to resolve practical problems or to yield a benefit to the City of Oshawa and its partners. Including Smart City, Teaching City, etc.

Users:

Innovation and Transformation

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

End of calendar year plus six years

Function:

Innovation and Transformation

Sub-Function:

Education

Type of Personal Information:

Sections (b) and (h)

Category of Individuals in Bank:

Participants and employees

Uses:

Generally based on the outcomes of research initiatives and program operations, design and delivery of training to City of Oshawa employees and stakeholders.

Users:

Innovation and Transformation

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

End of calendar year plus 10 years

Function:

Emergency Management

Sub-Function:

Exercise Management

Type of Personal Information:

Sections (d) and (h)

Category of Individuals in Bank:

Employees (members of the emergency operations team)

Uses:

Planning, scheduling and coordination of drills and other exercises, intended to test the adequacy of Emergency Plans protective relationships, training and other preparatory efforts, to improve the quality and effectiveness of a response in the case of a real emergency, in cooperation with other Municipalities, the Region of Durham, and Provincial Authorities.

Users:

Fire Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25; Canada Occupational Health and Safety Regulations (SOR/86-304) under the Canada Labour Code 17.10(1)

Retention Period:

End of calendar year plus 10 years

Function:

Emergency Management

Sub-Function:

Response

Type of Personal Information:

Sections (d) and (h)

Category of Individuals in Bank:

Employees (members of the emergency operations team)

Uses:

Upon recognition that a major fire, bomb threat, chemical spill, cyber attack, earthquake, transportation accident or other grave deviation from normal conditions has occurred, threatening the lives, health, property or security of the City of Oshawa, the implementation of the Emergency Plan leading to the reduction and eventual elimination of adverse impacts.

Users:

Fire Services

Legal Authority:

Municipal Act, 2001, S.O. 2001, c. 25

Retention Period:

Closure then immediately to archival storage