

# AVL Records Management and Public Records Guidance

## Public Records Act

Public Record requests will be coordinated by the department or office within which the employee, vehicle, or asset referenced in the request is managed. Legal Holds will be implemented by those departments or offices subject to them.

All data in the database is considered a public record. The database itself is a public record. While the Public Records Act does not require that we create records, in the case of a database, which can't be produced in its entirety, we do need to produce reports that are responsive to public records requests. The running of reports within the system is not creating a record; since the record is the database itself, the reports are just views of the data and a way to produce responsive records. Some "records" and data may be exempt from disclosure however:

- Employee addresses and corresponding GPS data are exempt from public disclosure. Wherever possible, the creation of geofences around the home of an employee who has an assigned/Take-Home Vehicle will prevent the disclosure of such data.
- Other exemptions may be applicable upon review by the department or office receiving the public records request. This will depend on how data is used and should be reviewed with legal counsel before records are withheld and an exemption cited.

## Records Retention

An important reminder about records is that it is **how** a record functions that dictates its retention. Below are some records categories and accompanying retention periods that are based on function.

Category Title:	Description of Records	Required retention period
Security Monitoring- Oversight, Surveillance Recordings (GS50-06B-18R1)	<p>Security recordings monitoring the agency's infrastructure, buildings, vehicles, equipment</p> <p>Includes, but is not limited to:</p> <ul style="list-style-type: none"><li>• Audio/visual recordings (digital or analog);</li><li>• Data generated by navigational and/or tracking devices used to track and/or verify vehicle routes, locations, or actions, such as Global Positioning System (GPS) tracking data, automatic vehicle locator (AVL) data, etc.</li></ul> <p><b>Note:</b> The data fields that capture speeding, routing, GPS points, hard breaking or other driving behaviors, except for idling, which is retained as part of the data in the Asset Use Category.</p>	30 calendar days
Asset Use Records (GS2012-045)	<p>Records relating to the dispersal and usage of the agency's assets. Includes all assets owned, rented, leased and/or maintained by the agency. Includes, but is not limited to:</p> <ul style="list-style-type: none"><li>• Energy usage measurements;</li><li>• Facility, equipment and vehicle use requests, checkout logs, rental/use schedules, statistical reports;</li><li>• Fuel/oil usage and dispersal data; pump/tank audit reports; mileage data, etc.;</li></ul>	4 years after year end

	<ul style="list-style-type: none"> <li>• Materials disbursement, supplies drawn from central stores, store reports, etc.;</li> <li>• Pit and quarry material control files.</li> </ul> <p><b>Note:</b> For King County’s purposes, idling data is considered a data point related to fuel consumption and will therefore be retained in accordance with this category.</p>	
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These are examples of records categories likely to be used across the enterprise. You’ll want to ensure that your department or office adds any additional categories needed to the retention schedule and file plan for your department or office. Retention within the system can be set at a data element level (speed data, fuel data, etc.). If there is data that is set for a 30-day retention, but you think you’ll need to keep it longer, you may need to export that data out to run reports or analytics on it later, and you’ll need to determine the category of records for that function and get it added to your retention schedule if it’s not already there.

Since the function of the record dictates its retention, if a record from either AVL category gets used for a **security incident, a citizen complaint file, employee investigation, accident report,** or some other purpose, that data/report will follow the retention of those categories, which are not AVL specific, but for which AVL records would be components of a more comprehensive record set.

**Protection of personal and private information related to people who are clients of King County.**

The AVL system collects no data about people who are clients of King County.

System users and administrators are prohibited from capturing information identifying people who are clients of King County’s services within the system.

Records (such as reports, analytics, etc.) that are created outside of the AVL system, but which use AVL system data, must be created and managed in a manner consistent with governing laws and policies related to personal and private information associated with people who are clients of King County. This might include HIPAA for some client records. Each department or office using the AVL system is responsible for the creation and management of records outside of the AVL system.