

SIR SANDFORD FLEMING COLLEGE POLICY MANUAL

Policy # 6-603 College Data Record Retention and Disposition	
Classification: Section 6 – Information Technology Services	
Approved by: Board of Governors	Date: May 1, 2013 (BoG May 1, 2013 #10)
Replaces: NEW POLICY	
Next Policy Review: 2018	Responsibility: Executive Leaders Team

Policy Statement

This policy is designed to provide guidelines in the retention and disposition of College data records.

Purpose

This policy provides for retention and disposition of College data records to comply with federal and provincial law, ensure that data is retained for only the period necessary to conduct business, and ensure the continuity of business practices until authorized to dispose of or destroy the data in accordance with defined data destruction processes and procedures.

Scope

All records, whether they be electronic files, paper, email, voice recordings, written notes, etc., that are created in support of the governance and operations of Fleming College are to be managed in conformance with relevant legislation and this policy. This does not include intellectual creations of faculty, staff and students as outlined in any related and current legislation, agreements or policies.

The primary office of responsibility for this policy is the Chief Information Officer.

Definitions

College Records Management Coordinator: (hereafter the “Records Coordinator”) means the person(s) given the responsibility for maintaining a records retention program and coordinating the storage or retrieval of dormant and archival records in a manner consistent with College policy and archival methodology standards.

Office of Primary Interest or “OPI” (as used by the Canadian Library and Archives): The office or department that has the main responsibility for a subject area and any related documents. The OPI is accountable for ensuring that its records are maintained according to this Policy. All other areas receiving a record either as a convenience copy or transitory record are not required to maintain the record for the same period of time as the OPI. An example could be the minutes of a committee. The department having responsibility for the committee must ensure that those records are properly protected. All others are not required to do so, and their copies are considered records of convenience.

General Principles

1. All College records produced by employees in the normal course of operations belong to the College.
2. Staff leaving Fleming College or relinquishing their position must leave all College records.
3. Each functional unit of Fleming College must create and maintain a Retention and Disposal Schedule for all records for which they are the Office of Primary Interest (OPI). Copies of these schedules must be shared and maintained by the Records Coordinator and reviewed at least annually.

4. The Retention and Disposition Schedule developed by any College functional unit shall be in accordance with any relevant provincial or federal statutes, contractual agreements and any other standards that are applicable.
5. Disposition of College records must ensure that no sensitive information is exposed.
6. Disposition of any centrally stored dormant records will take place automatically according to their disposal status unless the OPI notifies the Records Coordinator of an exception in advance.
7. Any institutional documents that are to be classified as 'archival' must be approved by the Records Coordinator.

Operating Procedure

1. Retention and Disposition Schedules

The retention and disposition schedule are determined based on the needs for each functional unit within Fleming College. Each unit, such as Human Resources, Registrar's Office, Physical Resources, etc., will determine the categories for records for which they are responsible, making them the OPI for that record. Each category will have a schedule that describes the disposition of the record, based on the functional unit's business and legal requirements.

In some cases, all the unit's documents may be handled in the same manner so that only one category is needed.

Determining the disposition will establish if the records will be disposed, archived or treated with some special consideration. A records retention and disposition schedule includes:

- period of time records are considered active and kept on a computer or in office space
- point at which records become semi-active (dormant) and are transferred to storage or offline media
- total period of time the records are maintained in storage
- disposition of records or permanent preservation.

2. Retention Periods

The retention periods indicated in these schedules are to be used as a recommendation concerning the length of time a record should remain in an active records office or online (A) and the length of time it should be stored in a dormant area (D). This is indicated, for example, by recording "A-2, D-3" for a record having a five-year retention.

The potential value of records should be evaluated against the cost of storage when establishing records retention periods by avoiding exaggeration of the frequency of reference to records (e.g. an "active record" normally should be referenced 1-2 times per month to retain its status).

Conditions are reflected in the Comments section of these schedules. On the expiry of its retention period, the actions required are identified. This is usually the ultimate disposition of the records either by secure shredding, erasure or transfer to the archives.

3. Disposition

The disposition indicated in these schedules is to be used to determine the handling of the document when it is no longer needed. Some documents may need to remain in storage until they are superseded or made obsolete. It is the responsibility of the OPI to inform the Records Coordinator of these changes and to update the storage records. Secure shredding of paper and erasure of electronic records will be done once the dormant period has passed. Those documents that are classified as archival will be kept permanently, but may require a different location for

storage depending upon access and preservation needs. The disposition will use environmentally sound practices that emphasize recycling to handle any material.

Related Documents

- *Retention and Disposition Schedules* will be created and maintained separately.

Appendices

Appendix A: *Data Record Retention and Disposition Procedure template*

Monitoring of Operating Procedure

Next Review: 2016

Responsibility of: *Chief Information Officer*

Procedure Review Summary:

Section and Month date, year

Section and Month date, year

Person/Department/Committee

Person/Department/Committee

Appendix A to Policy 6-603: *College Data Record Retention and Disposition*

[Name of office] Data Record Retention and Disposition Procedure

Subject	[Name of office] Retention and Disposition Procedure
Date of effect	[Effective date]
Date of last revision	[If applicable]
Date due for review	[Insert date]. Thereafter review at least once every year in line with recommendations in the Fleming College Data Record Retention and Disposition Policy.
Revised by	[Name, Title]
Related legal requirements, codes of practice and/or College policies	[A legally acceptable retention and disposition schedule should provide the legal and business justification for all retention periods, e.g.:] <ul style="list-style-type: none">• Ontario “Freedom of Information and Protection of Privacy Act” (“FIPPA”)• Employment Standards Act• Departmental business needs

CONTENTS

This procedure covers the following:

- Objectives
- Purpose
- Scope and Accountability
- Definitions
- Roles and Responsibilities
- Record Retention and Disposal
- **APPENDIX 1:** Retention and Disposition Schedule

OBJECTIVES

A record retention system includes the identification, classification and retrieval, storage and protection, receipt and transmission, retention, and disposal or archival preservation of the recorded information. Ideally, a record retention system will ensure records are maintained throughout their life cycle according to accepted standards; are available for decision-making; are protected from unauthorized loss and/or release; and are either stored for long-term or historical purposes or disposed of only when all of the College's legal and operational obligations have been met.

To summarize, a record retention system ensures that:

1. Documents are maintained according to their legal and business requirements
2. Storage of records that are not active is done in a cost effective and organized manner
3. Records that have historical importance to the College are preserved
4. Documents are promptly and securely disposed of when they are no longer needed

In the event that a lawsuit, claim or administrative charge has been initiated or there exists a reasonable belief that a lawsuit, claim or charge will be initiated – all relevant data and records must be preserved and safeguarded until the litigation or proceeding has terminated and the time for all appeals has expired.

PURPOSE

The **[name of office]** has developed this procedure to:

- Establish standard practice for the retention and disposition of **[name of office]** records, regardless of format (whether paper or electronic, including email)
- Establish standard schedule for the transfer / disposal of records (**Appendix 1**)
- Preserve College history (but with the understanding that only a small percentage of records continue to have value indefinitely and are kept permanently)
- Define responsibilities for the creation of policies and standards relating to, and the management of, **[name of office]** records.

SCOPE AND ACCOUNTABILITY

All records created, received, and/or maintained by **[name of office]** employees and those acting as agents in the course of their duties on behalf of **[name of office]**, regardless of physical form or characteristic (including paper, electronic, audiovisual, microform), are considered **[name of office]** property and subject to its control.

The policy therefore applies to all staff members of the **[name of office]** and all its direct predecessor organizations or bodies and covers all records regardless of format, medium or age and impacts upon those who:

- create records, including electronic records (e.g. email);
- have access to records;
- have any other responsibilities for records, for example storage and maintenance responsibilities;
- have management responsibility for staff engaged in any these activities.

DEFINITIONS

Record: any information contained in any physical medium which is capable of preserving such information. Includes any information contained in the original and in any copy of correspondence, memoranda, forms, directives, reports, drawings, diagrams, cartographic and architectural items, pictorial and graphic works, photographs, films, microforms, sound recordings, videotapes, videodisks, and video cassettes, punched, magnetic and other cards, paper and magnetic tapes, magnetic disks and drums, holographs, working papers, and any other documentary material or electro-magnetic medium - including electronic mail, regardless of physical form and characteristics.

Case File: [Explain the relevant “case file(s)” in your office, if applicable (e.g. student file, financial file, complaint file, etc). A **case file** is a file that contains documents that relate to a specific, time-limited entity or event, such as person, event, project, or organization. A **case file series** is a set of files that deal with similar types of cases, such as client files or project files.]

Subject Files: [Explain the relevant “subject file(s)” in your office, if applicable (e.g. samples of policies, advice from experts, newspaper articles, etc.) A **subject file** is a file that contains documents that relate to the same topic or subject matter. They are created because it is easier to retrieve records that are grouped together because they deal with the same subject matter. In practice, subject files are usually based on a topic, a type of document, or a source. This is very different from case files, which tend to be very homogenous throughout the series.]

Active Record: A paper or electronic record that is usually less than two years old and to which reference is sufficiently frequent that it must be held in close proximity for operational purposes.

Dormant Record: A record that is usually more than two years old and to which access is neither frequent nor urgent enough to warrant maintenance in relatively expensive office space.

Electronic files: Any electronic record stored either on a personal computer, central computing facility or electronic device. Online storage is usually considered to be records that are located on an active disk or memory device. Offline storage can be any storage medium such as diskette, tape, CD, DVD, USB key, etc. or a remote storage facility.

Non-Records: Records created incidental to performance of the College’s core activities. They are "operational", "support", and "service" type records which are considered to be of temporary value to the **[name of office]** (e.g. duplicate copies of correspondence, duplicate copies of records used for short term reference purposes, blank forms, and transitory messages used primarily for the informal communication of information, etc.). Transitory messages do not set policy, establish guidelines or procedure, certify a transaction, or become a receipt. Transitory messages may include but are not limited to e-mail messages with short-lived or no administrative value, voice mail, self sticking notes, document drafts, meeting notes, and telephone messages. Non-records and transitory messages should be maintained for as long as administratively needed, and the retention schedules do not apply. Non-records should be discarded when their business use has ended.

Retention Periods: The retention periods indicated in the **[name of office]** Retention and Disposition Schedule (Appendix I) are to be used as a recommendation concerning the length of time a record should remain in an active records office or online (A) and the length of time it should be stored in a dormant area (D). This is indicated, for example, by recording "A-2, D-3" for a record having a five-year retention.

College Records Management Coordinator: (hereafter the “Records Coordinator”) means the person(s) given the responsibility for maintaining a records retention program and coordinating the storage or retrieval of dormant and archival records in a manner consistent with College policy and archival methodology standards.

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protected. All others are not required to do so, and their copies are considered records of convenience.

ROLES AND RESPONSIBILITIES

The **[position title]** is ultimately accountable for the record keeping and records management practices of **[name of office]** and ensuring it follows this procedure. Note that the Fleming College Data Retention and Disposition Policy recommends the development of department-specific records management plans which include record retention schedules.

The **[position title]** is committed to enhance accountability, transparency and improvement of service delivery by ensuring that sound records management practices are implemented and maintained.

The **[position title]** supports the implementation of this procedure and requires each staff member to support the values underlying in this policy.

The **[position title]** shall mandate the **[position title]** to perform such duties as are necessary to enhance the record keeping and records management practices of **[name of office]** to enable compliance with legislative and regulatory requirements.

All **[name of office]** employees will be responsible for creating and maintaining records in relation to their work that are authentic and reliable.

Staff with specific responsibilities for records management will have these clearly defined in their job descriptions.

RECORD RETENTION AND DISPOSAL

What must be stored?

The retention periods outlined in a disposition schedules apply to "original," official corporate documents of the College. "Copies" or "duplicates" of any documents can be disposed when they are no longer required for reference purposes and they do not contain comments or quotes that may alter the purpose or direction of the record. These comments or quotes then become the record and should be maintained by the OPI. Records with administrative, legal, fiscal and long-term historical value must be retained for varying periods (even permanently) as determined by a records schedule.

How are they stored?

Active records are kept where they are readily available for use, either as a paper copy in the local office or as an active electronic file. Once a record no longer needs to be kept readily available, it becomes a dormant record that must be stored with sufficient information to determine the OPI, their creation and storage dates, their Retention and Disposition status and other relevant information as determined by policy. These records must be retrievable within an appropriate period of time based on any requests from their OPI or other authorized parties.

Disposition of records

Once the lifecycle of a record has expired, the record should be disposed in a safe and secure manner as described in the disposition section of the schedule. Electronic erasure of a computer file will be considered adequate for records. Any records stored in backups will be allowed to expire and the media reused.

Archived Files: Who decides if they are to be archived?

In consultation with the OPI, the Records Coordinator will determine if an institutional record needs to be archived due to its significance to the College. The goal of archived records is to preserve a

historical record of the College for the future. These records must be stored and maintained in a manner that preserves the material from deterioration or damage or from technological change. A catalogue of archived items is maintained that includes information on the OPI, storage date and status of any archived material as well as any historical context for the material.

It is important that disposal of records happens as part of a managed process and is adequately documented. Therefore, **[name of office]** must have in place clearly defined arrangements for the appraisal and selection of records for disposal, and for documenting this work.

The system should ensure that:

- The appropriate records are reviewed and disposed of / transferred to storage each year in accordance with this policy;
- Documentation of the disposal/transfer of records is completed and retained;
- Records subject to litigation, investigation and/or a Freedom of Information and Protection of Privacy request are not destroyed. Once the case has concluded, the records may be destroyed in accordance with this policy;
- When authorised, destruction of records must be completed securely, either by using an on-site shredder or through a company specialising in secure document destruction
- Staff will record the date of the disposal of the records, the month, year and means by which they were destroyed and how many files were destroyed. Care should be taken, however, to not retain identifying personal information in these disposal logs (except perhaps case file numbers or range to document that that specific case was disposed).
- Special care should be taken when disposing electronic documents or media that contain electronic documents. An approved data destruction tool must be used to destroy any electronic data on any device or media prior to disposal of the device/media. A typical “reformat” is not sufficient as it does not overwrite the old data.

Note: Ontario’s [Freedom of Information and Protection of Privacy Act](#) (FIPPA) and the [Municipal Freedom of Information and Protection of Privacy Act](#)(MFIPPA) and their respective regulations point to requirements for retention and disposal of personal information as well as general government records.

APPENDIX 1

[Insert Office] Retention and Disposition Schedule

Coding for “Record Security” (indicates degree of record security):
High - Protection of data is required by law or College Policy, practice and regulations;
Medium - Protection of data is not otherwise protected by statute or regulation, but Fleming has a contractual obligation to protect the data;
Low – Data has no requirement for confidentiality.

Coding for “Years” (indicates retention length):
A = Length of time retained in active records
D = Length of time retained in dormant area
FY = Fiscal Year (April 1 to March 31)
AY = Academic Year (September 1 to August 31)
CY = Calendar Year (January 1 to December 1)

Item #	Record Security (see above)	Title of Records Series	Format	Office of Primary Interest	Location	Active and Semi-active retention	Total Retention	Final Disposition
1.	High	e.g. Student file	Paper	RO	Filing cabinets (Active) and storage boxes (Dormant).	A4 D3	Graduation or date of last registration + 7 years.	Shred
2.	High	e.g. Personnel File	Paper	RO	Filing cabinets (Active) and storage boxes (Dormant).	A3 D4	Termination + 7 years.	Shred
3.	High	e.g. Personnel File	Electronic	RO	Shared directory.	A7	Termination + 7 years.	Delete