



# Records Management and Retention

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## Introduction

This policy applies to all records the First Nations University of Canada (FNU) uses to conduct business and to all First Nations University of Canada employees and Board members.

While it is important to protect the University's valuable business information assets, keeping records longer than necessary is costly in terms of storage and maintenance. The University's goal is to ensure its records are protected and maintained as valuable business assets while they are useful and properly archived or destroyed when they are no longer needed to conduct business.

## Definitions

**Record** means a record of information in any form and includes information that is written, photographed, recorded or stored in any manner, but does not include computer programs or other mechanisms that produce records. Examples of records include emails, information stored in any electronic records management system, electronic databases, documents, letters, memorandums, handwritten notes, agreements, papers, manuals, reports, journal books, drawings, sticky notes, etc.

**Record Holder** is the department, office or person responsible for the creation, distribution, use, maintenance, and disposition of a record. A record holder is responsible to ensure that appropriate security measures are in place when managing or disposing of records. The responsible out-of-scope manager has ultimate accountability for a department's official records and is considered the **Official Record Holder**.

**Permanent Record** includes any record that is vital to the continued functioning of FNU or that has lasting historical significance. Permanent records have enduring fiscal, legal,

administrative and archival value and are retained indefinitely. Wherever possible, permanent records should be retained in both original and electronic format.

**Administrative Records and Operational Records** relate to administrative functions or the operations and services provided by FNUUniv. These records have a specific life-span and may be disposed of after their required retention period. Prior to destruction, administrative records and operational records should be appraised for any continued organizational value and/or required extension to their retention period.

**Transitory Records** includes records of temporary usefulness that are needed only for a limited period of time, to complete a routine task, or to prepare an ongoing document. They are not required to meet statutory obligations or to sustain administrative or operational functions. Once they have served their purpose, they should be destroyed. Examples of transitory records include duplicate copies, drafts and working materials, meeting notes after official minutes have been approved, telephone messages, print or electronic mail messages of short-term value, publications from outside FNUUniv, advertising mail, blank forms, etc., that have no further use. Transitory records that have been substantially annotated (altered with hand-written or other comments or notes) that may have future value to FNUUniv will be filed with the master version.

**Active versus Inactive Record:** An active record or document is one the University still references or uses. It is required for current business operations.

An inactive record or document is one the University no longer uses for current business operations, but needs to keep; it will be archived or destroyed at the end of its retention period.

**Disposition:** Identifies the action to be taken with a record the University no longer needs for business — at the end of its inactive retention period. A record may be disposed of in one of four ways:

- **Archive** – the record has continuing historical or evidentiary value, so the department/unit responsible for it will transfer custody and control of the entire record to Archives.
- **Appraise** – the record may have some continuing historical or evidentiary value, so the department/unit responsible for the record will consult with Archives, and Archives will determine final disposition.
- **Destroy** – the record will have no further value to the University, so the department/unit responsible for the record will destroy the record and all copies of it. Paper records will be shredded or recycled. Electronic records will be deleted or overwritten.
- **Securely Destroy** – the security of the record must be protected when the record is destroyed. The record must be completely destroyed so there is no possibility of recovery or reconstruction.

**Electronic versus Paper Record:** An electronic record is any University record or document created, received, maintained, and/or stored on University computers or central servers in non-

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paper format, e.g., email, documents in Word and/or PDF (portable document format), spreadsheets, databases, videos, photographs, and audio recordings.

A paper record is any University record or document maintained in hard-copy paper format.

**Evidentiary Record:** A University record relevant to a known or anticipated audit, claim, complaint, dispute, investigation, grievance, or lawsuit.

**Legal Hold (Hold Notice or Preservation Notice):** A notice that compels the University to keep all records pertinent to an audit, claim, complaint, dispute, investigation, grievance, or lawsuit known or anticipated. A legal hold notice suspends the normal retention period and disposition of a particular record or records. The record or records are considered evidentiary and must not be disposed of or altered in any way until the notice is removed.

**Record Security Classification:** The information the University creates, collects, and uses is either confidential or public.

If the information cannot be disclosed to anyone except those persons requiring it for a legitimate purpose, the information is **confidential**. Confidential information includes, but is not limited to:

- information supplied in confidence, and
- commercially sensitive information.

**Restricted confidential information** is information the University is required to protect by law or regulation, and/or where the University is required to provide notice to someone or some authority if the information is inappropriately accessed. Restricted confidential information includes, but is not limited to:

- personal information,
- personal health information,
- any information covered by a non-disclosure agreement, and
- passwords and private encryption keys.

**Highly restricted confidential information** presents a grave risk to the University if it is compromised. The University collects highly restricted information only when absolutely necessary to conduct business. Highly restricted confidential information includes, but is not limited to:

- social insurance numbers,
- bank account numbers,
- credit card numbers,
- driver's license numbers, and
- health insurance identification numbers.

Confidential information (including highly restricted and restricted information) is in the following sorts of records or documents:

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- examinations,
- correspondence,
- employment applications,
- records of closed meetings,
- records subject to lawyer-client privilege,
- research proposals,
- institutional plans, policies, and projects while in development, and
- employment files.

Information is **public** when no other security classification need be applied to it. Public information can be viewed by anyone; no access controls are required. Public information includes, but is not limited to:

- University policies,
- Job postings and job descriptions,
- campus directories,
- University calendars, and
- the University's public website.

**Retention Period:** The period of time a University record must be kept after it becomes inactive or obsolete. The University's Records Retention Schedule provides retention periods and disposal instructions for all University records.

When necessary, records may be kept for longer than their retention period.

**Records Management Retention and Disposal Schedule:** A list of University records with information about how long each type of record must be kept, where, and how it is to be treated/handled/disposed of at the end of its lifetime.

**University Records:** All records the University needs and uses to conduct business. Includes paper and electronic records and documents created, executed, or received by a University office, department, or employee on behalf of the University.

Does not include:

- Stocks of printed or reproduced documents kept for supply purposes,
- Books, periodicals, newspapers, and other library materials made or acquired and preserved only for reference or exhibition purposes,
- Duplicate microfilm,
- Preliminary drafts of letters, memos, reports, worksheets, and informal notes that do not represent a significant stage in the preparation of the record,
- Copies of reports, memos, etc. made for convenience,

- Telephone slips, routing slips, etc.

## Policy

FNUUniv employees and its Board of Governors will ensure the integrity of all FNUUniv records. Any record created or received by FNUUniv employees or its Board of Governors, regardless of its format, is the property of FNUUniv.

All FNUUniv records will be retained and/or disposed of in accordance with this policy. Records not referenced will be managed in accordance with any applicable laws or regulations, or in compliance with the Saskatchewan Administrative Records Management System 2006 (ARMS 2006) or established and documented organizational and/or divisional guidelines.

Records must be classified according to the privacy and security requirements of their contents. Confidential records must be protected against unauthorized access or release.

The record holder is responsible for a record's retention and disposition. All FNUUniv records must be stored in a secure and/or suitable environment, be easily accessible and retrievable when required and, except for an act of God or other occurrence beyond the control of FNUUniv, protected against accidental destruction or loss. FNUUniv records that have enduring legal, operational or administrative significance will be preserved for as long as they are required. FNUUniv records that have historical significance will be retained permanently.

Disposal of FNUUniv records must be appropriate, timely, authorized by the appropriate manager, and carried out in a secure/confidential manner. Enhanced security measures must be followed during the storage, handling, transportation and disposal of records containing personal information or confidential business information.

Any unethical, malicious or unauthorized disclosure or disposition of FNUUniv records will not be tolerated.

Unauthorized access, release, use, alteration, or destruction of any University record is a breach of confidentiality and must be reported initially to the Vice President under whose authority the record owner falls. Upon review of the situation and outcome of the unauthorized access the Vice President may escalate the issue to the President who in turn may choose to escalate serious breaches to the Board of Governors.

## Secondary Copies of Records

Secondary copies of records are to be destroyed when the need for them is at an end. If the need is seen as ongoing secondary copies must be logged with the record owner and their storage location identified.

## Legal Holds

The destruction of a record(s) must be suspended when the University receives or expects to receive notice of an audit, claim, complaint, dispute, investigation, grievance, or lawsuit.

## Roles and Responsibilities

The record owner is responsible for a record's retention and disposition. (See Schedule 1 – 6 for identification of record owners)

## Consequences for Noncompliance

Failure to comply with this policy may result in:

- The loss of valuable information assets
- Increased storage and maintenance costs for records the University no longer needs
- Exposure to liability and sanctions if legal obligations are not met
- Possible dismissal from the University

## Related Information

- An Act Respecting the First Nations University of Canada
- [Records Management and Retention Policy – Procedure Statement](#)
- [Records Management Retention and Disposal Schedules](#)
- Employee Conflict of Interest Policy
- Board Conflict of Interest Policy