



Records and Information Management Program Policy

Policy 10.1

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| Section: | Privacy and Information Management | | |
| Approved By: | Council | Public: | Yes |
| Approved Date: | September 26, 2017 | Review Schedule: | Every 3 Years |
| Effective Date: | September 26, 2017 | Last Reviewed: | September 2023 |
| Amended Date(s): | | Next Review Date: | September 2026 |

Purpose

The Records and Information Management Program Policy outlines in detail how the College complies with its legal and operational obligations and requirements to manage records and information in its custody and control. This Policy shall promote the efficient creation, use, maintenance, retention and disposal of records and information and shall ensure that records and information are retained or disposed of according to legal and statutory requirements. The authority for the Records and Information Management Program Policy derives from the Records and Information Management Policy.

Policy statement

Electronic records and information are part of the usual and ordinary course of business of the College.

In order to establish the integrity and authenticity of records and information under the College's custody and control, electronic records and information shall be recorded in a records and information management system. The College's Records and Information Management Program Policy shall provide evidence of:

- the authenticity of the record or information;
- the integrity of the records and information management system the record or information was recorded or stored in; and

- that the record or information was made in the usual and ordinary course of business.

In doing so, the requirements for the admissibility of electronic records as documentary evidence in a legal proceeding are satisfied.

The Records and Information Management Administrator shall implement the Records and Information Management Program Policy in the usual and ordinary course of business of the College.

Any changes or revisions to the Records and Information Management Program Policy must be approved by the Council.

Application

This Policy applies to all records and information within the custody or control of the College, including records and information where an electronic record is intended to replace an original paper document and be accepted as documentary evidence in a legal proceeding. This Policy also includes, but is not limited to: records and information management systems, databases and business information systems. This Policy does not apply to service providers.

Content

The Records and Information Management Procedures Manual establishes clear organizational standards for the management of records and information from creation to disposal or permanent retention.

To ensure the admissibility of records and information as documentary evidence in legal proceedings, electronic records must comply with the National Standard of Canada, *Electronic Records as Documentary Evidence* CAN/CGSB-72.34-(2005).¹

The Records and Information Management Procedures Manual is supported by the following approved documents: the Records and Information Management Policy; the Records and Information Management Program Policy; the Records and Information Retention Policy; the Records and Information Retention Schedule; the Retention Schedule Management documents; the Digitization Process Manual; the College's Operations Manual; and the Information Security Policies.

The Records and Information Retention Schedule and accompanying management documents outline the procedures and process for:

¹ CAN/CGSB-72.34 specifies principles and procedures for creating all forms of electronic records to enhance their admissibility as evidence in legal proceedings. Admissibility under electronic record provisions such as s. 31.2(1)(a) of the *Canada Evidence Act* and s. 34.1(5) and (5.1) of the *Ontario Evidence Act* require proof of the integrity of the electronic records system by or in which the electronic record was recorded or stored. The requirements for establishing the integrity of a records management system are defined by CAN/CGSB-72.34. For the full text of the Standard, consult www.publications.gc.ca/site/eng/287649/publication.html.

- Record types authorized for capture and maintenance by the records management system
- Record types not authorized for capture or maintenance by the records management system
- Electronic information retention
- Electronic information disposition and destruction
- Retention scheduling
- Information disposition and destruction
- Indexing, registering and profiling

Built in features of the Electronic Document Management System provide:

- Audit trails
- Version control
- Change control and maintenance of documentation
- Updating procedures for the procedures manual
- Authenticated output procedures

The Operational Manual details the process and procedures for the creation of records and workflows. Self modifying files are not in use.

The Digitization Manual contains processes for document scanning, data and record capture and electronic document quality assurance.