

Policy

RECORDS MANAGEMENT POLICY

Number: IM 1

Classification: Information Management Approving Authority: Board of Governors Designated Executive Officer: President

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Associated Procedures: Responding to a Request for Access to or Correction of Information Procedures

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1.0 BACKGROUND

Administrative records are institutional assets and are vital to maintaining current business activities, assisting future operations and informing our institution's history. UNBC is committed to responsibly managing the information it receives and creates. The University is also committed to accurately documenting administrative activities and satisfying all regulatory and legal requirements for information management.

2.0 PURPOSE

The purpose of this policy is to:

- 2.1 define authorities, responsibilities and accountabilities for Records Management;
- 2.2 ensure that University records are created, used, disposed and preserved in a systematic manner that is compliant with relevant legislation;
- 2.3 ensure that public requests to access records in the custody or control of the University is in compliance with the BC *Freedom of Information and Protection of Privacy Act* (FOIPPA);
- 2.4 ensure preservation of the University's records of permanent value.

3.0 SCOPE

- 3.1 This policy applies to records in the custody or control of UNBC and the management of records by all units within the University.
- 3.2 This policy does not apply to:
 - 3.2.1 records containing teaching or research materials of faculty, teaching assistants, research assistants or any other person teaching or carrying out research at UNBC; or,
 - 3.2.2 records placed in archives by a person or agency other than UNBC.



4.0 DEFINITIONS

- 4.1 <u>Access</u> includes both disclosure of records under FOIPPA as a result of a request, and routine release of records that contain information that is available to the public or to an individual.
- 4.2 <u>Administrative Authority</u> means individuals with administrative responsibility for units including, but not limited to, Vice-Presidents, Associate Vice Presidents, Deans, Directors, Chairs and other unit leads.
- 4.3 <u>Control</u> refers to the University's authority to manage records that relate to its mandate and functions, and which the University relies upon for business purposes. (see <u>Appendix 1</u> of the *Protection of Privacy Policy*)
- 4.4 <u>Custody</u> means the University has the possession of a record and responsibility for its care and protection. (see <u>Appendix 1</u> of the *Protection of Privacy Policy*)
- 4.5 <u>Disclosure</u> means to transmit, reveal, show, expose or provide copies of Personal Information or records within the custody or control of the University.
- 4.6 <u>Disposition</u> means the final retention action carried out on a record. This may include destruction, deletion, secure destruction or deletion, or transfer for archival review or to a third party.
- 4.7 <u>Employee</u> means a person who is employed by the University and is remunerated for their work. For the purposes of this Policy and the associated procedures, each reference herein to Employee also includes Officers of the University (E.g. members of Senate and the Board of Governors), volunteers and service providers to the extent appropriate in the context.
- 4.8 <u>Personal Information</u> means recorded information about an identifiable individual other than business contact information. (<u>See Appendix 2</u> of the *Protection of Privacy Policy*)
- 4.9 **Records** include books, documents, maps, drawings, photographs, letters, vouchers, papers and any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means, but does not include a computer program or any other mechanism that produces records.
- 4.10 **Records Management** means the application of systematic controls to the creation, use, maintenance, storage, retrieval, disposition and preservation of all



- forms of recorded information produced by the University in the conduct of its operations.
- 4.11 <u>Transitory Records</u> includes records of temporary usefulness, required only for a limited period of time for the completion of a routine action or the preparation of an ongoing record. Transitory Records do not include those records required to meet statutory obligations, or to sustain administrative or operational functions.
- 4.12 <u>Unit</u> refers to administrative or academic areas of the University including, but not limited to, departments, schools, facilities, and offices.

5.0 POLICY

- 5.1 Roles and Responsibilities
 - 5.1.1 The Senior Governance Officer is responsible for the oversight of records management at the University.
 - 5.1.2 The Governance Officer Access, Privacy and Records Management is responsible for:
 - i. providing standards and guidelines to assist in the implementation of records management across the University;
 - ii. maintenance of the University's records management program, including University-wide classification retention and destruction and disposition plan; and
 - iii. providing records management direction, training and advisory services.
 - 5.1.3 Administrative Authorities are responsible for ensuring University records under their control are:
 - i. managed according to this Policy and related procedures;
 - ii. protected from inappropriate access, alteration and use;
 - iii. stored and maintained only in University-approved repositories;
 - iv. retained in accordance with the Records Retention Schedule governing their respective records; and
 - v. destroyed only in accordance with this Policy or as required by law.
 - 5.1.4 All employees are responsible for:
 - i. creating university records only to carry out the University's business and perform necessary transactions;



- ii. directing all non-routine public requests to access information to the Office of Access, Privacy and Records Management.
- iii. notifying their respective Administrative Authority regarding any mismanagement of records including improper storage or unscheduled destruction; and,
- iv. ensuring that all records remain in the custody or control of the University.

5.2 Disposition

- 5.2.1 Records scheduled for disposition containing personal or confidential information and identified as having no long-term value are destroyed in a secure and permanent manner.
- 5.2.2 Records scheduled for disposition (including Transitory Records) must not be disposed of when:
 - i. identified in current or pending litigation;
 - ii. responsive to a current access to information request under FOIPPA;
 - iii. the subject of an audit; or
 - iv. identified in quasi-judicial or legal proceedings.
- 5.3 University Records Management Program Audit
 - 5.3.1 The Office of University Governance is responsible for deploying a systematic audit of the University's records management program once every three years to ensure the records management practices of all University units are compliant with the University's Records Management Policy and related procedures.
 - 5.3.2 The purpose of the audit is to improve the performance of the Records Management Program and ensure that University records maintain their authenticity and reliability.

6.0 REPORTING

- 6.1 The Senior Governance Officer is responsible for reporting on the progress of the Records Management Program to the Board annually.
- 6.2 The Senior Governance Office is responsible for reporting on the findings of the University Records Management Program Audit as outlined in section 5.3 of the Policy to the Board every three years.



7.0 AUTHORITIES AND OFFICERS

The authorities and officers for this policy are as follows:

Approving Authority: Board of Governors Designated Executive Officer: President

Procedural Authority: President

Procedural Officer: Senior Governance Officer

8.0 RELATED LEGISLATION AND STANDARDS

Freedom of Information and Protection of Privacy Act, R.S.B.C. 1996

9.0 RELATED POLICIES AND OTHER ASSOCIATED DOCUMENTS

- Secure Destruction and Deletion of University Records Guidelines
- Records Management and Digitization Guidelines
- Protection of Privacy Policy
- Departmental Records Schedules