

## RECORDS AND INFORMATION MANAGEMENT POLICY

This document is the parent policy for any college or divisional procedures. Questions regarding this policy are to be directed to the identified Policy Administrator.

<b>Functional Category:</b>	Operations
<b>Approval Date:</b>	March 25, 2020
<b>Effective Date:</b>	March 25, 2020
<b>Policy Owner:</b>	Vice President, People and Culture
<b>Policy Administrator:</b>	Manager, Compliance

### Objective:

NorQuest College (college) has an obligation to manage and control its information and records to support operational needs and legislative compliance.

Effective records and information management helps to achieve the college's strategic goals by:

- informing and enabling college decisions;
- enhancing the efficiency and efficacy of programs and services;
- managing risk to the college by protecting its information assets;
- ensuring compliance with appropriate regulatory requirements, standards, and best practices; and
- maintaining evidence of the college's activities in all formats.

NorQuest College's records and information will be governed to promote usability as a valuable organizational asset, accessibility through appropriate file formats and metadata, and interoperability as needed across the college's systems.

Authority to establish this policy is derived from the [NorQuest College Board of Governor's Policy No. 5](#), which delegates authority to the President and CEO to establish policies and procedures for the college's management and operation.

### Policy:

#### PROPERTY OF

All records and information, in any format, created, received, or maintained by college employees in carrying out, supporting, or otherwise related to their duties or work are the property of the college and are subject to this policy, associated procedures, standards, and associated guidelines. The college will manage all records and information in compliance with relevant legislation, standards, and best practices.

#### LEGAL FRAMEWORK

The college's records and information management responsibilities relate to a wide set of statutes and regulations, and in particular, those monitored through the college's Legislative Compliance Program. These statutes include, but are not limited to: *Freedom of Information and Protection of Privacy Act*, *Post-Secondary Learning Act*, *Income Tax Act*, *Copyright Act*, *Employment Standards Act*, *Employment Equity Act*, and *Limitations Act*.

The college will manage records in its custody and control by:

- promoting efficiency in the creation, maintenance, access, storage, retrieval, and disposal of college records;
- ensuring the integrity, authenticity, reliability, and usability of college records;

- retaining official records for appropriate retention periods, as per the Records Retention and Disposition Schedule, according to legal, operational, and administrative requirements of the college;
- implementing adequate records and information systems, internal controls, and risk management to meet college business needs;
- ensuring that records are promptly and securely disposed of once the retention periods have elapsed;
- collecting, retaining, and handling confidential records and information responsibly;
- preserving and making available the college's archival records;
- defining and communicating records and information management roles and responsibilities; and
- overseeing the cost of maintaining records.

**PRINCIPLE STATEMENTS:**

**Records and Information Management program must be maintained**

The college will maintain the records and information management program. Creation, implementation, and monitoring of this program is the responsibility of the Compliance Office.

**Records must be created**

Records are to be created to document or facilitate the transactions of all business activities. Business processes are to be put in place to ensure that requirements to make records are documented and that systems are in place to facilitate the creation of records. All staff are to be made aware of their responsibilities to create records.

**Records must be accurate**

Records are to be created at the time or as soon as practicable after the event to which they relate. All records created by the college are to provide a correct reflection of what was done, communicated, or decided.

**Records must be authentic**

Records created or received by the college are to be routinely captured into an approved recordkeeping system and appropriate metadata created and captured, or otherwise associated with records.

**Records must have integrity**

Recordkeeping systems and storage facilities are designed and implemented to protect records from unauthorized access, alteration, deletion, or loss. Unauthorized access, alteration, or destruction of records is prohibited. Migration of records from one system to another is to be controlled, documented, and compliant with best practice.

**Records must be accessible**

Records are to be linked to their business context, which includes records relating to the same business activity or transaction. The location and use of records is to be recorded and tracked. Records are to be accessible for as long as they are required and disposed of.

**Records must be disposed of appropriately**

Records must be disposed of in accordance with legislative requirements, policy, and recognized standards of best practice.

**Risk must be managed**

Risks to records and information must be identified and adequately monitored and managed as per the business continuity plans. Disaster

prevention and response, and recovery strategies for systems containing high risk and high value records and information (also called vital records) must be implemented across the college.

### **RESPONSIBILITY**

Records and information management is a shared responsibility. All NorQuest employees have a responsibility to ensure that the college records that they create and receive as part of their role are complete, accurate, and managed effectively. Additional responsibilities for certain employees are listed below.

#### **Executive Head and Divisional Head**

Each Executive Head and Divisional Head are responsible for the visible support of a culture of compliant records and information management within the college. Each Executive Head and Divisional Head will designate a Records and Information Coordinator to oversee operational matters and to liaise with the Compliance Office in matters related to implementation of and compliance with this policy.

#### **Compliance Consultant**

The Compliance Consultant is responsible for overseeing the management of records and information at the college consistent with the requirements described in the policy, including the provision of advising, training, authorizing the disposal of records and information, and approving new software used at the college.

The Compliance Consultant is responsible for developing and promoting compliance with the college's records management program. This program includes the records management policy, procedures, guidelines, educational resources, retention schedule, and training.

#### **Director, Information Technology (IT)**

The Director of Information Technology is responsible for maintaining the technology for the college's business records and information systems in accordance with legislation and this policy. This includes routine testing or audits of systems to ensure that there are no issues affecting information integrity, usability, confidentiality, or accessibility. The Director of IT is responsible for the reliability and security of the college's centrally administered information systems and information technology infrastructure, and for managing associated risks.

#### **Supervisors**

Supervisors are responsible for ensuring staff, including contract staff, are aware of, and are supported in following the records and information management practices defined legislatively and within this policy.

As part of the development and implementation of new systems, supervisors must ensure that records and information management requirements are identified and managed. Supervisors are responsible for ensuring the migration and decommissioning of systems while taking into account the retention and disposal requirements for records and information held within the system.

#### **Contracted Staff**

Contracted staff are required to create and manage records and information in accordance with this policy to the extent specified in the contract.

**Records and Information Coordinators**

Records and Information Coordinators are responsible for providing support to record creators in their respective college departments to ensure that their departments' records are managed in accordance with this policy. Records and Information Coordinators liaise with the Compliance Office and their department on the development, implementation, and enforcement of approved records related procedures and guidelines.

**Definitions:**

**Accessibility:** the availability and usability of information.

**Accuracy:** the degree to which data, information, documents, or records are precise, correct, truthful, free of error or distortion, or pertinent to the matter.

**Authenticity:** the trustworthiness of a record as a record: the quality of a record that is what it purports to be and that is free from tampering or corruption.

**Division Head:** means anyone who manages a division or multiple divisions. Division Head is responsible for a division(s) reporting directly to an executive and normally includes Deans and Directors but may also include an executive or senior manager.

**Executive Head:** means anyone who manages groups of divisions. Executive Heads can include vice-presidents or the President and CEO.

**Integrity:** the quality of being complete and unaltered in all essential respects.

**Official Record:** a complete, final, and authorized version of a record. Provides evidence of business transactions, is required by legislation, provides evidence of compliance with business requirements, and contributes to the building of NorQuest's memory for scientific, cultural, or historical purposes.

**Record:** recorded information created, received, and maintained by an organization or individual in pursuance of its legal obligations or in the transaction of business. Means a record of information in any form and includes notes, images, audiovisual recordings, x-rays, books, documents, maps, drawings, photographs, letters, vouchers and papers and any other information that is written, photographed, recorded or stored in any manner, but does not include software or any mechanism that produced records.

**Transitory Record:** are records in any format that are of short-term value, with no further uses beyond their primary purpose.

**Trustworthiness:** the accuracy, reliability and authenticity of a record.

**Usability:** the measurable quality of how usable a record or record system is.

**Related NorQuest  
College Information:**

- [Physical Records Disposition Procedure](#)
- [Physical Records Transfer and Retrieval Procedure](#)
- [Records Retention and Disposition Schedule](#)
- [Technology & Creative Services Data Classification Standard](#)

**Related External Information:**

- [Freedom of Information and Protection of Privacy Act](#)
- ISO 15489: 2001 Records Management – Part 1 and Part 2
- [Post-Secondary Learning Act](#)

**Next Review Date:**

April 2024

**Revision History:**

December 2013: new  
November 2014: update for change in policy owner and administrator  
April 2017: update for more developed responsibilities and change in administrator  
August 2019: Compliance Office template & reorganization update  
February 2020: update for roles and responsibilities; expanded principle statements