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.

Functional category	Operations
Approval date	May 1, 2024
Effective date	May 1, 2024
Policy owner	Vice President, Administration and Chief Financial Officer
Policy administrator	Director, Information, Risk & Compliance (IRC)

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 <u>NorQuest College Board of Governor's Policy No. 5</u>, which delegates authority to the President and CEO to establish policies and procedures for the college's management and operation.

Policy

GENERAL

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, accessibility, 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 information is 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 through the curation, maintenance, and preservation of a permanent collection;
- defining and communicating records and information management roles and responsibilities; and
- overseeing the cost of maintaining records and information.

PROPERTY OF

All records and information, in any format, whether physical or digital, 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 informed by business need.

LEGAL FRAMEWORK

The college's records and information management responsibilities relate to a wide set of statutes and regulations, 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*.

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 Information, Risk & Compliance division.

Records and Information Assets must be created

Records and information assets 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 and Information Assets must be accurate

Records and information assets 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 and Information Assets must be authentic

Records and information assets 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 and Information Assets must have integrity

Recordkeeping systems and repositories are designed and implemented to protect records and information assets from unauthorized access, alteration, deletion, or loss. Unauthorized access, alteration, or destruction of records is prohibited, and the college will ensure that our systems have appropriate levels of access permissions and protections attached to them. Migration of records from one system to another is to be controlled, documented, and compliant with best practice.

Records and Information Assets must be accessible

Records and information assets are to be linked to their business context, which includes records relating to the same business activity or transaction being linked to each other. The location and use of records and information assets is to be recorded and tracked. Stakeholders' access to the records and information they are using is important: education in RIM practices that maximize findability of records and accessibility will be offered. Records are to be accessible for as long as they are required.

Records and Information Assets must be disposed of appropriately

Records and information assets must be disposed of in accordance with legislative requirements, policy, the NorQuest College Records and Retention Disposition Schedule, and recognized standards of best practice.

Records and Information Management Training is available and must be taken

The college will provide ongoing training for employees to develop their understanding of this policy, their records and information management responsibilities, and the best practices they can adopt in their daily work. In addition to ad hoc and optional opportunities, successful completion of the IRC Records and Information Management online course is required of all employees. Training progress will be administered and tracked by the college.

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.

Members of the Executive Team and Divisional Heads

Members of the Executive Team and Divisional Heads are responsible for the visible support of a culture of compliant records and information management within the college. Each member of the Executive Team and Divisional Head will designate a Records and Information Coordinator (RIC) to oversee operational matters and to liaise with the Information, Risk & Compliance division in matters related to implementation of and compliance with this policy.

Policy and Information Management Manager

The Policy and Information Management Manager is responsible for overseeing the management of records and information at the college consistent with the requirements described in this policy, including the provision of advising, training, and authorizing the disposal of records and information. The Policy and Information Management Manager will work with Business Technology Services (BTS) and other as part of the approval process for new software used at the college.

The Policy and Information Management Manager is responsible for developing and promoting compliance with the college's records and information management program. This program includes the records and information management policy, procedures, guidelines, educational resources, retention schedule, and training. The Policy and Information Management Manager is responsible for developing the Records and Information Coordinator (RIC) network and for promoting a culture of compliance within the college.

Director, Business Technology Services (BTS)

The Director, Business Technology Services (BTS) 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, BTS is responsible for the reliability and security of the college's centrally administered information systems and information technology infrastructure, and for managing associated risks.

People Leaders

People Leaders are responsible for ensuring faculty and staff, including permanent and Term positions and contractors, 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, People Leaders must ensure that records and information management requirements are identified and managed. People Leaders are responsible for ensuring the migration and decommissioning of systems while accounting for the retention and disposal requirements for records and information held within the system.

Employees

Employees 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 (RICs)

Records and Information Coordinators (RICs) are responsible for providing support to record and information creators in their respective college divisions to ensure that their divisions' records are managed in accordance with this policy. Records and Information Coordinators (RICs) liaise with the Information, Risk & Compliance (IRC) division and their division on the development, implementation, and enforcement of approved records and information 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.

Divisional Head: means anyone who manages a division or multiple divisions. The Divisional Head is responsible for a division(s) reporting directly to a member of the Executive Team and normally includes Deans and Directors but may also include a member of the Executive Team or manager.

Employee: includes a person who is engaged by NorQuest College to perform a service in accordance with existing terms and conditions of employment, employment contracts or collective agreements.

Executive Team: includes the Chief of Staff, Vice Presidents, and 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.

People Leader: means an employee whose job function requires them to organize, direct, and control the work of others. People Leaders can include team leads, chairs, associate chairs, managers, deans, directors, vice-presidents, or the President and CEO. Another term for People Leader is Supervisor.

Record: recorded information created, received, and maintained by an organization or individual in pursuance of its legal obligations or in the transaction of business. This 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 information

NorQuest College

- Physical Records Disposition Procedure
- Physical Records Transfer and Retrieval Procedure
- Records Retention and Disposition Schedule
- Technology & Creative Services Data Classification Standard

External

- 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

May 2028

Revision history

Date	Version Number	Action
December 2013	V1	New.
November 2014	V2	Update for change in policy owner and administrator.
April 2017	V3	Update for more developed responsibilities and change in administrator.
August 2019	V4 (published as V3-C)	Compliance Office template & reorganization update.
February 2020	V5 (published as V4)	Update for roles and responsibilities; expanded principle statements.
May 2024	V6	Updated titles, roles, and responsibilities; edited for clarity; updated the principle statements; and ensured clarity of scope.