



## RETENTION PROCEDURE

Authorizer: Vice President, Finance and Corporate Services

Version: V1

Effective Date: 12/8/2021

### PROCEDURE STATEMENT:

This procedure sets out the principles for managing and retaining records at Conestoga College Institute of Technology and Advanced Learning (Conestoga) to meet organizational, legal, and fiscal needs in order to reduce costs, promote efficiency, free up valuable storage space, and eliminating clutter (physical or digital).

### SCOPE:

This procedure applies to all of Conestoga users with respect to recorded information, regardless of form or media, with the exception of research data (research data does not include related project and grant administration information.)

### PROCEDURE ELABORATION:

#### Record Management

1. Managing Conestoga's information is the responsibility of all users.
  - a. Users will document, through creating and maintaining accurate and complete records, decisions and outcomes in order to ensure Conestoga's obligations are met and work can be carried out efficiently and effectively.
  - b. Users will follow retention schedules.
  - c. Recorded information made and received by Conestoga belongs to Conestoga and not its individual users and forms part of the information in Conestoga's custody and control. Users who leave Conestoga will leave all of their work-related records for their successors.
2. Users will treat records received or created electronically as the originals and will not print electronic records for recordkeeping purposes.
3. When digitizing paper records, users will follow established standards to ensure they are accessible over time.
4. At the end of its lifecycle, users will destroy or irreversibly erase back-up data without a chance of recovery of the data. Backup data is not a record - Backup data is created for the sole purpose of business continuity and must not be used as a primary information repository.

5. At the end of the information lifecycle, users will dispose of records either by destruction in a manner that ensures the confidentiality of the records is protected, or by transfer to the Archives. Digitally created records must not be printed for safekeeping but instead disposed of in their digital format.
6. Records requested as part of an FIPPA request along with those that are part of a legal investigation are put on hold and must not be destroyed.

### **Retention Periods**

7. Retention periods and disposition actions will be assigned to record series documented in the Appendix detailing Retention Periods.
8. Corporate Services will coordinate and update the Appendix detailing Retention Periods in partnership with the various business owners.
9. Corporate Services will update Retention Schedules detailed in the Appendix quarterly as needed.

### **Transitory Records**

10. Transitory records typically have a limited value and should only be retained if they have reference value to the user. Transitory records are subject to FIPPA.
  - a. Users will destroy transitory records at the discretion of their departments.
  - b. If a transitory record contains personal information used to make a decision about an individual, it must be retained for at least one year.
  - c. If there is a request under FIPPA that involves transitory records and they have been kept longer than when they could have been destroyed, users will not destroy the transitory records until the request has been processed and the appeal period has lapsed.

### **Exceptions**

11. Exceptions to this procedure will be granted at the discretion of the Vice-President, Finance and Corporate Services.

### **DEFINITIONS:**

#### **Archives**

The designated archival repository for Conestoga under the direction of Conestoga's Library Services

#### **Conestoga Users**

Individuals who access and or use Conestoga's data while performing their duties on behalf of the College. Users include, but are not limited to, Conestoga employees (full time, part time, definite term, casual, etc.), contractors, consultants, and volunteers.

#### **Disposition**

Destruction and or transfer to the Archives

## **Record**

Record means any record of information however recorded, whether in printed form, on film, by electronic means or otherwise as defined in FIPPA. This includes records that are not complete such working drafts, voicemail, etc.

## **Transitory Records**

- Records of temporary usefulness in any format or medium, created or received by a public body in carrying out its activities, having no ongoing value beyond an immediate and minor transaction or the preparation of a subsequent record. Transitory records are of such short-term value that they are not required to meet legal or fiscal obligations, initiate, sustain, evaluate or provide evidence of decision-making, administrative or operational activities.
- Transitory records are often created during routine activities and convenience copies including copies of documents from other organizations, broadcast emails retained for convenience sake, copies of records when the original is sent to another unit i.e. a copy of an invoice, routine emails about scheduling an event, promotional materials from suppliers, etc.

## **REFERENCES:**

*Freedom of Information and Protection of Privacy Act (FIPPA)*

*Ministry of Training, Colleges and Universities Act*

*Ontario Colleges of Applied Arts and Technology Act*

*Personal Health Information Protection Act*

## **RELATED DOCUMENTS:**

Appendix A: Retention Schedule

Records and Information Management Policy

## **REVISION LOG:**

December 1, 2021

Academic Forum

December 8, 2021

Academic Coordinating Committee