

RECORDS MANAGEMENT POLICY

PURPOSE

The purpose of this Policy is to enable Brock University to manage University Records in compliance with all legal requirements and best practices. The Policy outlines the University's requirements with respect to the retention and destruction of University Records and aims to enhance the University's accountability, transparency, efficiency and responsible management of information.

SCOPE

This Policy applies to all University Records.

This Policy applies to all University employees, volunteers and agents who create, receive, handle, store, maintain, and dispose of University Records.

This Policy does not apply to those records that are not University Records (as defined below), including teaching and research records acquired or created by faculty members that are unrelated to the operation and administration of the University.

If any provision of this Policy is found to be inconsistent with the provisions of a collective agreement, the collective agreement will prevail, unless the Policy provision is required by law, in which case the Policy provision will prevail.

POLICY STATEMENT

Brock University is committed to managing University Records so as to efficiently and securely process and handle information, protect information assets, and meet all regulatory and legislative requirements.

The University will maintain a Records Management Program, which will consist of, at a minimum, a comprehensive Records Classification and Retention Schedule (RCRS), associated procedures, standards and guidelines, education and training, and compliance monitoring.

Ownership of Records:

- University Records are the property of the University rather than the individual who created or received them, and remain the property of the University even after the end of their relationship or affiliation with the University.

Responsibilities:

- All University employees, volunteers, and agents must retain and dispose of University Records in accordance with the Records Classification and Retention Schedule (RCRS), and all associated procedures, standards, and guidelines. Transitory Records may be retained for as long as necessary and must be disposed of securely in accordance with the University's Records Destruction Procedure.
- **Records Stewards** are those positions identified by the RCRS as responsible for the records in a particular Records Series. As such, they are responsible for overseeing the records management practices of the department or unit that handles those records and for providing input, reviewing and providing input on the Records Series for which they are responsible. Records Stewards, or their delegate, approve unit-specific retention schedules, and sign off to authorize the disposition of records.
- The **Records Coordinator** is responsible for educating, training and raising awareness of the Records Management Program, for developing records management procedures and guidelines, for proposing amendments to the Records Classification and Retention Schedule and for

ensuring the Records Management Program remains accurate and relevant.

- The **University General Counsel & Associate Vice-President Legal, Compliance & Privacy** is responsible for maintaining and overseeing the Records Management Program, approving retention schedules that apply broadly to most or all units (i.e. that are not about records specific to one unit), and delegates authority to the **Records Coordinator** to authorize records dispositions in accordance with the Records Destruction Procedure.
- The **Head of Archives and Special Collections** is responsible for the final review of records that are designated to be transferred into the University Archives Collection, as identified by the RCRS. The Archives and Special Collections Mandate (section 2) provides the criteria by which University Records are to be designated "Archival".

DEFINITIONS

For the purposes of this policy, the following definitions apply:

Disposition means the final stage of managing records in any format. Disposition may mean permanent retention, transfer (to the University Archives or an external agency), or destruction.

Personal Information means "information about an identifiable individual", as further defined in [Freedom of Information and Protection of Privacy Act \(FIPPA\)](#), and as outlined in the University's [Access to Information and Protection of Privacy Policy](#).

Record means a record, as defined in [FIPPA](#) as "any record of information however recorded, whether in printed form, on film, by electronic means or otherwise, and includes,

a. correspondence, a memorandum, a book, a plan, a map, a drawing, a diagram, a pictorial or graphic work, a photograph, a film, a microfilm, a sound recording, a videotape, a machine readable record, any other documentary material, regardless of physical form or characteristics, and any copy thereof, and

b. subject to the regulations, any record that is capable of being produced from a machine readable record under the control of an institution by means of computer hardware and software or any other information storage equipment and technical expertise normally used by the institution"

Records Classification and Retention Schedule (RCRS) means the listing of all University Records, classified by function and listed by Records Series.

Records Series means a type or categorization of records that belong together because they relate to a common function or business process. A Records Series includes the following information: a description of the records, their responsible unit and Records Steward, citations of relevant legislation, regulation, or internal policy, their retention period, a rationale for the retention period, whether the records series contains personal information (i.e., is a Personal Information Bank), and how the records are categorized by the Data Classification Standard.

Records Steward means the person or position identified by the RCRS as having responsibility for a particular Records Series.

Retention Period refers to how long and by what criteria a record is kept (e.g., end of fiscal year + 7).

Transitory Record means records that are kept or referenced for a short duration of time and are not needed to be kept for legislative, regulatory, administrative, or operational purposes.

University Record means any record:

- in the custody or under the control of the University;
- created or received, and maintained as evidence of University decisions, transactions, and relationships; and,
- relevant to the administration and operation of University activities.

For greater clarity, records created through research and academic activities that are not used for the administration and operation of University activities are not University Records. Records related to research and academic activities which are used for the administration and operation of the University (e.g. administrative records, financial records, records that demonstrate compliance with legislative, regulatory or funding agency requirements) are University Records, in accordance with FIPPA.

COMPLIANCE AND REPORTING

Brock University will ensure compliance with this Policy by providing employee training and awareness and with periodic reviews of records practices.

This Policy is under the jurisdiction of the General Counsel & Associate Vice-President Legal, Compliance & Privacy. The interpretation and application of this Policy is the responsibility of the General Counsel & Associate Vice-President Legal, Compliance & Privacy.

Policy owner:	President and Vice-Chancellor
Authorized by:	Board of Trustees, Governance/Nominating Committee
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Related documents:	Access to Information and Protection of Privacy Policy Records Classification and Retention Schedule Records Destruction Procedure Digitization Standard for University Records Data Classification Standard Archives and Special Collections Mandate