Sheridan	**THE SHERIDAN COLLEGE INSTITUTE OF TECHNOLOGY AND ADVANCED LEARNING**
TITLE: RECORDS AND INFORMATION MANAGEMENT POLICY	

Date of Approval: February 10, 2015; October 13, 2015; May 23, 2019 **Effective Date: May 23, 2019**	**Mandatory Review Date:** May 23, 2022	**Approved By:** ☐ Board of Governors ☒ President and Vice Presidents ☐ Senate

1. PURPOSE

At The Sheridan College Institute of Technology and Advanced Learning ("Sheridan"), Records (as defined below) are a strategic asset and the responsible governance, management, and use is critical to ensuring that Sheridan abides by all relevant legal and operational requirements and is capable of conducting business effectively.

The purpose of this Policy is to:

- Outline Sheridan's system of interconnected policies, procedures, guidelines, strategies, and technologies that identify all requirements regarding Records and Information Management;
- Define the roles and responsibilities for all Users (as defined below) and establish clear lines of accountability;
- Define the accountability of a committee at Sheridan that will contend with related matters, to be named the Privacy, Records, and Information Management (PRIM) Committee;
- Ensure the continuous development of the Records and Information Management system that will protect Sheridan's Records against internal and external threats and mitigate associated risks;
- Ensure that Sheridan complies with all applicable laws, regulations, and standards including, but not limited to, compliance with the *Freedom of Information and Protection of Privacy Act* (FIPPA) and the *Personal Health Information Protection Act* (PHIPA); and
- Improve Sheridan's stewardship of Records and maximize the successful use of Records to inform and support organizational planning and decision making.

2. SCOPE

- This Policy applies to every Sheridan User and applies to all Records used in the administration of any and all Sheridan business, whether administrative or academic;

- This Policy applies to all governance, academic, and administrative sites and situations where Sheridan does business, and includes all official Records that are held by Sheridan, or other Records that are under the Sheridan's stewardship and control;
- This Policy applies to Records regardless of format, whether active or inactive, on-site or off-site, in all areas of Sheridan and includes, but is not limited to, any and all academic, administrative, and governance records of the Sheridan.

3. DEFINITIONS

"Access" is the right or opportunity to, or means of, reading, copying, querying, finding, or retrieving Records.

"Accessioning" is the act of taking legal and physical stewardship of a group of records and formally documenting their acquisition, transfer, and receipt.

"Active Records" are records that are created or received in the course of Sheridan operations and that are regularly used to conduct business activities. These Records are maintained in the Responsible Office for their entire active life and remain under the custody, responsibility and control of the generation area until change in disposition occurs.

"**Corporate Archive"** is an archival collection made up of historical Records relating to the activities, business dealings, and unique contributions of Sheridan. The Corporate Archive chronicles the history of Sheridan from its inception onward, and provides evidence, context, and value to its history; as well as imparting a memory to the Sheridan community.

"Device" means an Internet-capable computer hardware device that could connect to the Sheridan network and includes desktop computers, laptops, smartphones, tablets, thin clients, printers, faxes, scanners, or other specialized hardware.

"Disposition" means the disposal of Records no longer needed for day-to-day operations by a business unit, through destruction, secure destruction, transfer to Sheridan's Department of Records and Information Management, or through accession to Sheridan's Corporate Archive. Records scheduled for disposition containing personal or confidential information and identified as having no long-term value must be destroyed in a secure and permanent manner. Records that will be kept permanently by Sheridan will be determined as such through the Office of General Counsel.

"Inactive Records" are records no longer needed to support day-to-day operations by a Responsible Office but have not yet met the final disposition date. Inactive records remain under the custodianship of the Department of Records and Information Management once their active retention has been reached and up until their secure disposal once their full retention has been achieved.

"Legal Holds" supersede any and all Sheridan policies authorizing destruction of Records, including the authority granted in approved retention schedules. Records scheduled for disposition must not be disposed of when such Records are:

- Relevant to current or foreseeable litigation;
- Responsive to a request made under FIPPA and/or PHIPA;

- The subject of an audit; or
- Relevant to an internal appeal or investigation.

If the content of a Record is related to actual or pending litigation or government investigation, it may not be destroyed without the expressed permission of Sheridan's General Counsel. This restriction begins from the moment when any Record User gains knowledge that legal action or a government investigation is reasonably foreseeable and remains in effect until removed by Sheridan's General Counsel.

"Originating Department" is a business unit and / or office of Sheridan that creates a Record and has been listed in the Records Classification and Retention Schedule as the Department who is responsible for keeping a particular Record series throughout their Active life. Note that all Originating Departments must abide by all policies, procedures, guidelines, and practices applicable to Sheridan Records as outlined by the Department of Records and Information Management and the Office of General Counsel.

"**Other Holds**" refer to any hold (other than a Legal Hold) that is placed on a Record or a set of Records that supersedes the authority of the Records Classification and Retention Schedule (RCRS). This can include administrative, archival, financial, or retention holds. While a Record is on hold, destruction is suspended until lifted through the Office of General Counsel.

"Personal Information" uses the same definition as in Sheridan's Privacy Policy (as per FIPPA).

"Record" refers to any Record of information however recorded, whether in printed form, on film, by electronic means or otherwise (as per FIPPA).

At Sheridan, there are several Record types and Record stages that are detailed in the charts below. Please note that these definitions are not exhaustive, but illustrative.

<u>**Record Types:**</u>

Physical Records	Records that comprise a physical medium. These can include, but are not limited to: correspondence, memos, books, plans, maps, drawings, diagrams, graphic works, photographs, film, microfilm, sound recordings, videotapes, machine readable records, and any other documentary material, regardless of physical form or characteristics, and includes any and all copies.
Electronic Records	Records created and maintained in digital computer systems. This can mean any record that is capable of being produced from a machine-readable record under the control of Sheridan by means of computer hardware and software or any other information storage equipment and technical expertise normally used by the institution, or to which the institution can reasonably gain access. Examples of electronic records can include email, Word / Excel documents, websites, databases, text messages, social media, SharePoint sites, information contained in content management systems, etc.
Corporate Archival Records	Records that serve as the evidence of Sheridan's historical activities and act as its institutional memory. Corporate Archival Records are derived from an educated sampling of Sheridan's inactive and active

	records, decided upon by the Department of Records and Information Management, in consultation with relevant business units.

Record Stages:

Active Records	Records that are created or received in the course of Sheridan operations and that are regularly used to conduct business activities. These Records are maintained in the Responsible Office for their entire active life and remain under the custody, responsibility and control of the generation area until change in disposition occurs.
Inactive Records	Records no longer needed to support day-to-day operations by a Responsible Office but have not yet met the final disposition date. Inactive records remain under the custodianship of the Department of Records and Information Management once their active retention has been reached and up until their secure disposal once their full retention has been achieved.
Transitory Records	Records that are only created to move information from one medium to another. Ex: printing out statistics to enter into a database.

"Records Life Cycle" refers to the process of planning, creating, managing, storing, implementing, protecting, improving, disposing, and preserving of all Records.

"**Records and Information Management**" is the interconnected structure of policies, procedures, guidelines, strategies, and technological requirements that identify all requirements regarding Records and Information Management at Sheridan.

"**Records Classification and Retention Schedule (RCRS)**" is a formal document which outlines all types of Records at Sheridan as well as their required classification and retention periods.

"Secure Electronic Signature" is the equivalent of a digital signature and comprises one or more letters, characters, numbers, or other symbols attached to an electronic document and is validated as secure if it abides by a set of agreed upon technical operations.

"Security" refers to the safety of Sheridan Records in relation to matters such as: access control, authentication, change management and version control, disaster Management, effective incident detection, reporting, and solution, physical and virtual Security, vital Records, among others.

 "User" means any employee or authorized contractor and/or agent who accesses, creates, inputs, amends, deletes, extracts, and / or analyses Records in order to carry out their day-to-day duties.

4. POLICY STATEMENTS

Statement on Sheridan's Authority to Collect Records / Personal Information

- Records at Sheridan are collected under the Ontario Colleges of Applied Arts and Technology Act, 2002;
- Records comprising Personal Information at Sheridan are governed under the authority

of the Freedom of Information and Protection of Privacy Act with the exception of records of personal health information which are governed under the authority of the Personal Health Information Protection Act.

Statement on Records and Information Governance Principles

The following principles outline the minimum standards that guide Sheridan's Records and Information Management Procedure and must be adhered to by all Sheridan Users:

- Sheridan is committed to the accuracy, quality, integrity, and consistency of Records and Information Management practices. Accordingly, users are expected to comply with this Policy and any and all associated guidelines and procedures;
- Sheridan, rather than any individual department or area, is the owner of all Records, unless subject to an agreement to the contrary. Final decisions as to the governance and stewardship of all Records shall be made by the Department of Records and Information Management in consultation with the Office of General Counsel;
- The appropriate organization, classification, security, and maintenance of Records is expected at all levels of the organization. For further information, please refer to affiliated procedures (listed under Related Documentation);
- Records generated and received on a Device that is a result of an employee's relationship with Sheridan shall be considered the property of Sheridan. This may include but is not limited to: laptops, tablets, and mobile phones – both Sheridan-provided or personal. Sheridan's Copyright policies shall continue to apply to any such Records, as applicable;
- Pro-active assessment, development, monitoring, and constant improvement of Records and information management programs, practices, and systems contribute to the betterment of Sheridan; and activities that may affect the integrity, quality, usability, or accessibility of records and information assets must be coordinated in collaboration with the Department of Records and Information Management.

Statement on Retention and Disposition

- Appropriate and responsible disposition of Sheridan Records creates efficiencies, protects Sheridan from liability, and creates value for Sheridan;
- Decisions made regarding the final disposition of Records ought to be made mindfully and in full consideration of matters related to authority, timeliness, security, and documentation requirements;
- Full activities related to the disposition of inactive records is executed by the Department of Records and Information Management;
- Once a record moves from an active to an inactive stage, it will be disposed of securely.

Records which do not comprise an inactive retention period shall be securely disposed of within their responsible department in consultation (as applicable) with the Department of Records and Information Management.

Statement on Corporate Archives

- The purpose of a Corporate Archive is to collect Records, such as documents and other materials, created in the course of an institution's business activities in order to preserve them for their enduring value;

- Authority for decisions related to archival accessioning, preservation, maintenance, and use of the Corporate Archive will be delegated to the Manager, Records and Information Management who will also act as Sheridan's Archivist.

Statement on Research

- Records, including those which include personal information, that are collected, used, and / or disclosed for research purposes at Sheridan will be maintained in compliance with this policy as well as with the affiliated Guidelines Governing Records and Information Management for Research Projects that have been developed in consultation with legal, regulatory, and / or industry requirements;
- Researchers must have in place documented processes which outline how they intend to collect, use, manage, retain, and dispose of Sheridan Records which will be used for research purposes.

Roles and Responsibilities:

The Head of the institution (Sheridan's President) is responsible for ensuring that:

- Reasonable measures are developed, documented and put into place to preserve records in accordance with any recordkeeping or records retention requirements, rules or policies, or legislative requirements which apply to Sheridan;
- Adequate resources are allocated to support the above.

Responsible Executives are responsible for ensuring that:

- Records created and/or accumulated in Originating Departments are managed in accordance with this Policy and any associated procedures, including those related to Legal Holds;
- Records are only collected for legitimate uses and to add value to Sheridan;
- When an employee leaves a position, Records are left in the custody of Sheridan;
- Behaviour consistent with the responsible management of Records and Information assets is modelled such that a good example is set for other employees.

Every User is responsible for ensuring that:

- The administration of all Records is in compliance with this Policy as well as all affiliated procedures, guidelines, and recommendations;
- Adherence to Record Sheridan's Records Classification and Retention Schedule is maintained;
- Records containing personal or confidential information are protected from unauthorized access and disclosure, in accordance with FIPPA, PHIPA, as well as Sheridan's Privacy Policy and related procedures;
- Disposal (ex: destruction and transfer) of Records is authorized and documented in accordance with any associated procedures;
- Personal use of Records, in any format and at any location, is prohibited;
- Where appropriate, before any Record (other than a publicly available Record) is shared outside of Sheridan, the Quality, Integrity and Security is considered in relation to this Policy and affiliated Procedures;
- Records stored in an electronic format are protected by appropriate electronic

safeguards and/or physical Access controls that restrict appropriate Access. Similarly, Records in hard copy format will be stored in a manner that restricts Access; and

- Compliance with any and all affiliated procedures and guidelines is maintained.

Sheridan's Records and Information Management Department is responsible for ensuring that:

- The stewardship of Sheridan's Records is maintained in the most responsible, transparent, and trustworthy way possible; with all efforts made to do due diligence to Sheridan's legislative and operational requirements;
- Appropriate policies, procedures, guidelines, and protocols, Retention Schedules, and all related Records and Information strategies and systems are created, maintained, documented, communicated, and disseminated;
- Records and Information Management systems are researched, audited, benchmarked, and consistently improved as per the evolution of the RIM field and in accordance with legislative, regulatory, and business obligations;
- Training is developed as required and that compliance with Records and Information Management principles is consistently monitored;
- Sheridan's corporate memory is preserved through the Corporate Archive.

Under the guidance of the Department of Records and Information Management, Sheridan's Privacy, Records, and Information Management Committee is responsible for:

- Bringing forward issues of significance to privacy, records, and information management at Sheridan and working to find appropriate solutions and ensure best practices;
- Working with the Sheridan community to ensure that privacy, Records, and Information Management requirements are well-communicated and understood.

The Responsible Office for this Policy shall be the Office of General Counsel.

5. RELATED DOCUMENTATION

Acceptable Use Policy
Informal Access Request for Student Information from Individual and Third Party
Corporate Archival Procedure
Code of Professionalism and Civility
Access and Release of Student Information Policy
Electronic Document Imaging Procedure (EDI)
Electronic Records and Information Management Procedure (TBD)
Employee Technology Policy
Informal Requests for Information Procedure
Legal Hold Procedure
FIPPA Request Procedure
Guidelines Governing Records and Information Management for Research Purposes (TBD)
Records and Information Management Procedure
Records Classification and Retention Schedule (RCRS)
Policy One – Development and Management of Policies and Procedures
Privacy Policy
Student Code of Conduct