Sheridan	THE SHERIDAN COLLEGE INSTITUTE OF TECHNOLOGY AND ADVANCED LEARNING
TITLE: PHYSICAL RECORDS AND INFORMATION MANAGEMENT PROCEDURE	

Date of Approval: May 31, 2019 Effective Date: June 6, 2019	Mandatory Review Date: June 6, 2022	Approved By: Department of Records and Information Management

1.   Purpose

The purpose of the Physical Records and Information Management (RIM) Procedure is to ensure consistent, secure, and sustainable handling of Records at Sheridan in accordance with applicable Sheridan policies and all relevant legislation.

2.   Scope

These procedures apply to all Users as defined in the Records and Information Management Policy.

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.

"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 (RIM), 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 RIM once their active retention has been reached and up until their secure disposal once their full retention has been achieved.

"Inactive Records Centre (IRC)" is the repository where physical records are stored once they have passed their active retention but have not fulfilled their full retention. Sheridan has an Inactive Records Centre onsite but stores a large portion of inactive records in an offsite storage centre as well.

"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 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 RIM 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. This procedure deals explicitly with processes for physical records.

<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 RIM, 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 RIM 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.

"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. Procedure

Users are responsible for the development of appropriate internal practices to ensure that Sheridan's Records are maintained in accordance with Sheridan's policies, including but not limited to the Records and Information Management and Privacy Policies. The Department of

RIM can provide support to your departmental area if you have questions about how Sheridan's requirements might be implemented in your department.

Sheridan's Records and Information Management User Guide contains detailed information on several records-related guidelines including how to name documents for simpler file retrieval, how to manage physical records (including transfer records to and from Sheridan's Inactive Storage Repository), how to securely dispose of records, etc.

The Records and Information Management User Guide, RCRS, and all other affiliated guidelines can be accessed on Access Sheridan under the Office of the General Counsel and Information and Privacy Office.

<u>Maintenance of Active / Inactive Records</u>

Once a record has reached the end of its active retention, the record can be transferred to Sheridan's IRC. In order to identify the active, inactive, and full retention periods for any record, please refer to Sheridan's RCRS.

The process of transferring records is coordinated through the Department of RIM. Please refer to the steps below:

Follow these steps in order to minimize delays and ensures boxes will be accepted for storage.

Step 1: Preparing your Records for Transfer

Refer to Sheridan's [Records](#) [Classification and Retention Schedule (RCRS)](#) in order to determine which Records are Inactive and eligible for transfer. It is critical that Records are appropriately classified to ensure that they are being maintained and destroyed for the correct amount of time to fulfill both legislative and operational requirements. Be sure to discard items that have no enduring value to Sheridan. Items of this sort are:

- Records which have passed their total retention limit;
- Blank forms, convenience copies, and other transitory items;
- All other duplicate materials: keep only the original and annotated versions of documents;
- Records from other departments sent for informational purposes, etc.

Contact the Department of RIM (Records-management@sheridancollege.ca or x5584) if you require assistance.

Step 2: Boxing your Records

- Pack files into standard storage boxes available from the Department of RIM. Departments can place an order for boxes via the RIM email address (above) and Sheridan's Records Officer will email when they are ready for pickup. Do not use any other type of box as they will not fit on the standard shelving in Inactive Storage and will not be accepted;
- Space is at a premium so please only send boxes that are more than three quarters full. A correctly packed box will have enough space to remove and replace a file folder easily, but not so much space that the folders will fall or bend. The Department of RIM will return boxes that are overfilled or broken;

- Pack and list files from the same Record series together in the same box(es) whenever possible;
- When boxing files, it is helpful to ensure that the retention periods for the records are similar, as this cuts down on off-site storage costs. It is acceptable to include several years' worth of files in order to fill a single box when necessary;
- Do not take documents out of their original file folders. Pack the original file folders into the boxes with the folder tabs clearly visible when the box lid is opened. Place the files in the same order as they were arranged in the department's filing cabinets and follow the existing departmental filing system;
- Remove hanging file folders and replace with regular file folders wherever necessary. Hanging folders will damage the boxes and cannot be destroyed once retention has expired;
- Records originally stored in 3-ring binders can be transferred in file folders, using the descriptive information from the original binders.

Step 3: Completing the Transfer Forms

- Complete a [Records Transfer List](#) identifying the contents of each box and place a copy of the Records Transfer List in the box and ensure that you maintain a copy of all listings in your departmental files. The Department of RIM will retrieve files for you, but it is the responsibility of the department to know which files they have in the IRC. Transfer lists should include a file number, classification code, the file title / description and date range;
- Please note that all boxes must be coded according to the RCRS and their contents listed on the records transfer lists in order to be accepted for transfer to the IRC.

Step 4: Transferring Boxes

- Contact The Department of RIM (Records-management@sheridancollege.ca or x5584) and inform them of the required transfer;
- Report the number of boxes to be transferred to and ensure that each box contains a copy of the Records Transfer List. Complete information helps with locating your files later;
- Decide to have the boxes transferred. This can be done through Facilities Services or you can have someone from your staff deliver the boxes. The Department of RIM will not pick up your boxes however, you must advise them of the drop off time so that a RIM staff member can provide access to the IRC.

Step 5: Maintaining Transfer Lists

Once your boxes have been processed, the Department of RIM will send you a copy of the transfer list showing the box number. Retain this list in order to request boxes or files.

Records Retrieval

Transferred records can be retrieved upon request. Under regular working conditions, the Department of RIM will strive to process requests for information within 3 business days. If there is a problem locating a document or file, the requesting department will be informed promptly. Please refer to the steps below:

- Check your departmental transfer lists in order to clearly identify the files / boxes you need

to retrieve;

- Using the transfer lists, locate the name, title and / or number of the file to be retrieved as well as the identifying number of the box the file is contained in;
- Initiate a retrieval request by submitting a RIM general email to records-management@sheridancollege.ca and provide the above information about the files you wish to retrieve;
- Ensure that the files are returned to the Department of RIM once they are no longer needed.

Note: any files which contain personal information should be transferred in blue security bags available through the Department of RIM. As the Department of RIM has a limited number of bags, please ensure that they are returned promptly.

Records Destruction

Timely destruction of Records according to Sheridan's Records Classification and Retention Schedule (RCRS) is essential for the elimination of unnecessary costs in storage, filing, and access. Destruction procedures should ensure that confidential information is disposed of properly. Destruction procedures apply both to the original version as well as to copies.

- Copies can be destroyed at any time prior to the original Record being destroyed or transferred to the IRC. There are no legal requirements to retain copies of Records once their retention requirements are met, unless a Legal Hold has been initiated. Please see Sheridan's RCRS for more information regarding retention requirements.
- Every Record has an established retention and some Records do not have an inactive retention period. Only those Records that are identified as having an Inactive Record retention requirement will be transferred to and retained in the IRC. If a Record only has an active retention period, they can be deposited in the secure shredding bins once their active retention has been met.
- From time to time, the Department of RIM will forward lists of files to your department that are ready for destruction. You will be asked to review the files for consistency and to ensure there are no files being destroyed prematurely
- The Department of RIM tracks the retention periods for records in the IRC and will send your department a Destruction Notice Form when Records transferred by your department have met the end of their life cycle. An authorized employee will be asked to review and sign the notice and destruction lists. They will then be returned to the Department of RIM who will review and sign prior to the official destruction taking place.

All formal destruction records are maintained by the Department of RIM.

Disposal of Confidential Information

A significant quantity of Records created or received by Sheridan contains confidential information such as social insurance numbers, home addresses and other personal information. If Sheridan Records contain confidential information, their removal and destruction must receive special care.

Confidential Shredding Bins

In order to make the destruction of confidential Records both convenient and secure, the Department of RIM has made large confidential shredding bins available at all Sheridan Campuses for the disposal of confidential, sensitive Records. The containers are locked,

and their contents are shredded on a regular schedule.

Confidential shredding bins can be requested from the Department of RIM for departments conducting file purges and needing to dispose of large quantities of confidential material. If a bin is full and requires changing, you can contact the Department of RIM at records-managenet@sheridancollege.ca or x5584 with your request.

Disposal of Non-Paper Media

Special requests for disposal of hard drives, plastics or other media will be handled separately and can be dropped off at the Department of RIM. Please make an appointment prior to drop off.

Revisions to the Records Classification and Retention Schedule (RCRS)

Sheridan's RCRS applies to all Records created and / or maintained by Sheridan, and details contained in the [Records Classification and Retention Schedule (RCRS)](#), represent Sheridan policy for the maintenance and disposition of Sheridan Records. No Records can be destroyed or disposed of unless authorized by an approved retention schedule for the related Records series and sign-off by the manager of the responsible department.

Five (5) - Year Review

To ensure Sheridan's RCRS remains current and reflects changes in programs, organizational structure, and information retention requirements, the schedule will be formally reviewed every five years.

How to Propose Changes

Notwithstanding the above, in the interval between these formal reviews, departments may wish to suggest changes to Sheridan's RCRS, an addition of a new Records series for Records not previously retained and/or not covered by the existing scheme, or changes to the retention schedule for an existing Records series. To do so, please contact Records Management to begin the process described below:

The Department of RIM will review the proposed change with representatives from the requesting department;

- If the change affects other departments, the department requesting the change must ensure all other departments affected are given the opportunity to comment on the proposal: only changes to which the majority of affected departments agrees will proceed to the next step;
- The change to which the Department of RIM and the requesting department(s) agree will be considered for approval;
- Approved changes will be published as revisions in the [Records Classification and Retention Schedule (RCRS).](#)

Legal Holds

There are circumstances where the normal and routine destruction of Records must be suspended. Present and future Records that are involved in litigation, or reasonably anticipated in foreseeable legal action, must be preserved until the Legal Hold is released by the Office of

General Counsel.

Any Sheridan employee who becomes aware of any litigation, threat of litigation, other legal action, or an investigation by any administrative, civil or criminal authority, through the receipt of notification or other information identifying the possibility of legal action or upon service of a summons and complaint, must immediately notify the Office of General Counsel. The Office of General Counsel will determine whether to initiate a Legal Hold, pursuant to established protocols.

Please refer to Sheridan's Legal Hold Procedure for more information.

5.   Related Documentation/Links/Forms

FIPPA - Freedom of Information and Protection of Privacy Act
FIPPA Request Procedure
Privacy Policy
 Sheridan Records Classification Scheme and Retention Schedule
Legal Hold Procedure