Policy 46 & University Records Management

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Secretariat
Overview

- **Policy 46 – Information Management**: roles & responsibilities; principles & practices
- University records management in Policy 46: compliance & information lifecycle management
- Records management in 5 steps
- Records retention schedules: new format
- Examples: employment files; tenure & promotion
- Documenting destruction of records
Policy 46 – Information Management

- Defines how we manage the University’s information: what “good” information management consists of.

- **Scope:** University records (administrative info), library collections (published info), research reports & data shared with University community.

- **Out of scope:** research data & other “scholarly works” (Policy 73 term) not yet shared with University community.
Policy 46 roles & responsibilities

- **Information Stewards**: senior admins reporting to President & Provost: overall responsibility for administration & therefore the associated information

- **Information Custodians**: managers/supervisors: delegated operational responsibility for information

- **Information Users**: all employees, students & others accessing University info

- **Information Service Providers**: IM & IT support: e.g., IST, external providers, Privacy Officer, me
Policy 46 principles & practices

- **Accountability and Accessibility**
  - Information is made available, by established procedures & obeying relevant laws.

- **Privacy and Confidentiality**
  - Protected as required by law (e.g., FIPPA) & contracts/agreements.

- **Compliance**
  - With all applicable laws, regulations, contracts/agreements

- **Information Quality**
  - [Obvious but necessary – no one wants bad info]
Policy 46 principles & practices

- Information Security
  - All the stuff that IST Info Security Services does.
  - Privacy class’n: public, confidential, restricted, highly restricted.

- Information Lifecycle Management
  - “Cradle to grave” management of info: from creation/collection to disposal/destruction.
  - University records retention schedules document the rules & who’s responsible for administrative information.
Info management committees: AIGC & IRMC

- Administrative Information Governance Committee (AIGC)
  - Information Stewards
  - Strategic oversight; monitoring Policy 46 implementation

- Information & Records Management Committee (IRMC)
  - Information Custodians & Information Service Providers
  - Supporting Policy 46 implementation
  - Brainstorm new projects, support collaboration, & improving info management practices
Policy 46 & records management

- Compliance & Information Lifecycle Management
  - Meet statutory/regulatory & accountability requirements for records (e.g., Employment Standards Act, & HR records)
  - Manage information from creation to deletion/destruction.
  - Document what information we create or collect, which office is responsible, & when we get rid of it.

- WatClass, the University Records Classification & Retention Schedules: the main tool supporting lifecycle management of records.
University records

- All recorded information created, received, & used by University & employees in their work for Waterloo.

- If it’s information created or used in University administration, it’s a record.

- All formats & media:
  - Enterprise system content (Quest, HR, etc.), email, letters & memos (paper & electronic), meeting minutes, photos, video of university events, web & social media content (twitter, etc.)
Managing records in 5 Steps

1. Know what records you have: maintain an information inventory.

2. Know which records your office is responsible for: match your inventory to WatClass.

3. Organize your records, assisted by the WatClass structure.

4. Destroy transitory records (copies & ephemeral records) when no longer needed.

5. Dispose of records at the end of their retention period & document their disposal.
WatClass: 12 categories for all records

- 3 core functions: (bold = completed sections)
  - Research Management (RS)
  - Student Management (ST)
  - Teaching & Learning (TL)

- 9 supporting functions:
  - Administration (AD)
  - Campus Services (CS)
  - University Relations & Advancement (UR)
  - Finance (FN)
  - Governance (GV)
  - Health, Safety, & Security (HS)
  - Human Resources (HR)
  - Info Management (IM)
  - Property & Facilities (PF)
New drafts coming soon, including:

- **Administration (AD)**
  - AD05 – Program & Service Management
  - AD15 – Office Management & Support
  - AD18 – Inquiries & Requests for Information
  - AD30 – Administrative Committees [revised version]
  - AD40 – Planning & Review
  - AD46 – Organization
  - AD48 – Policies, Procedures, & Guidelines
  - AD50 – University Risk Management & Internal Audit
  - AD70 – Contracts and Agreements
Organizing records: keep it simple

![File system hierarchy]
Records retention schedules: new format

- Jan. 2018: now in accessible PDF format.
- Information added to the schedules:
  - Information Steward(s) for records.
  - Policy 46 privacy/confidentiality classification for the records: public, confidential, restricted, or highly restricted.
    - The classification means that one can typically expect to encounter confidential/restricted/highly restricted info, not that every record contains such information.
    - Appropriate security measures should be implemented.
Example: FN15, P-Card records

FN15 – Purchasing Card Transactions

These records relate to the acquisition of goods and services through the UW purchasing card (P-card) program.

Content & Scope
The P-card program was established in 2005 to empower authorized card holders to pay for goods using a University Visa credit card.

The records include packing slips, invoices, receipts, Visa slips, and monthly Visa statements.

Responsible Unit
Units with individuals holding P-cards.

Information Steward
Vice President, Administration & Finance

Privacy Classification
Highly Restricted.

Retention
7 years.

Disposition
Secure Destruction.

Authority
Income Tax Act, 1985, s.230 (4)(b)

Retention Rationale
Income Tax Act, s. 230 (4)(b) specifies that records be kept for 6 years after the taxation year to which they relate.

Approval Date(s)
April 14, 2010
EXAMPLES

Human Resources; T&P
HR: “appointments” retention schedules

- HR07 - Appointments (Academic Administrative Officers)
- HR08 - Appointments (Non-Regular)
- HR10 - Appointments (Regular Faculty)
- HR12 - Appointments (Regular Staff)
HR: employment files

- HR20 - Employment Files (Other Faculty)
- HR22 - Employment Files (Regular Faculty)
- HR24 - Employment Files (Regular Staff)
- HR26 - Employment Files (Research/Teaching Assistants, Postdoctoral Fellows)
- HR28 - Employment Files (Temporary/Casual Staff)
- And don’t forget:
  - HR82 - Vacation Records
HR: appointments & employment files

- Shared responsibility of the hiring unit + HR, except for regular staff.
  - Regular staff employment files & performance appraisals are HR’s responsibility. Files kept by supervisors are transitory copies.
- Faculty (reg., definite term), TAs, RAs, temp/casual staff (e.g., co-op work-term):
  - Hiring unit: position search records & employment files kept by managers/supervisors.
  - HR: records needed for pay, benefits & pensions; enterprise systems (HRMS, payroll, pensions).
HR: Canadian Citizens & Permanent Residents

- Appointment records kept for 1 yr. after employment offer accepted.
  - Successful candidate’s application added to their employment file.
- Employment files kept for 5 yrs. after employment ends (3 yrs. for temp/casual staff).
- Retired tenured faculty files go to University archives after 5 yrs. (but contact me, first).
  - Weed out performance reviews & payroll printouts.
HR, foreign nationals: 6 year rule

- Why?: “employer compliance reviews” by federal government.

- Appointment records kept for 6 yrs. after work start-date.
  - For faculty, keep the same records as sent to UARC.

- Employment files kept for 6 yrs. after employment ends (definite-term faculty, temp/casual staff).

- Same 6 year rule applies to records of foreign national “visitors.”
  - Contact Visa & Immigration Support (Yanick Charbonneau & Fran Hannigan) for assistance.
HR38 – Tenure & Promotion

- HR38 summarizes the rules in *Policy 77 – Tenure & Promotion of Faculty Members*.

- Responsibility for a candidate’s file travels with the file: DTPC → FTPC → UTPC
  - Probationary reappointment files & withdrawn T&P files are added to person’s employment file;
  - Destroy copies of candidates' files which progress to the next level once the final decision, including any appeal, has been rendered.
  - Secretariat keeps UTPC records, including candidates’ files.
Documenting records destruction

- Proof that we’re following our retention rules.
- It’s a FIPPA requirement that we document disposal of personal information (including copies).
- Required for hard-copy & digital records/files.
- Instructions & PDF form available on RM website.
- Print, sign, & store the completed form for 7 years.
  - Electronic files are easily edited/altered, so the PDF itself isn’t trustworthy documentation of destruction.

University Records Management, Chris Halonen
University of Waterloo Records Destruction Form (13 March 2018)

Use this form for the destruction of official records (i.e., records for which your unit is identified in WatClass as a “Responsible Unit”) and copies of records containing personal information. Print and retain a signed paper copy for your records.

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