

 <p>Confederation COLLEGE POLICY</p>	Number: 1-1-04	# of Pages: 3
	Originator:	Computer Services
	Approved By:	Senior Team
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	Replaces:	New
RECORDS RETENTION		

Preamble

College records are created when transactions or communications are stored or retained. This includes books, documents, maps, reports, plans and other business transactions. Records can be on paper or in electronic format, and can be administrative or academic in nature.

Confederation College manages records to be compliant with its legal, operational and administrative requirements. Records are used for conducting business transactions, reporting and analysis purposes including:

- The College’s ability to respond to legal claims
- Legal requirements (e.g., Income Tax Act)
- Compliance with Ministry regulatory requirements
- Information for future use (e.g., ability to contact alumni)

The College has a legal obligation to protect an individual’s right to privacy. Measures to protect confidentiality are in place to ensure compliance with the requirements of the Freedom of Information and Protection of Privacy Act (FOI/POP). Under the Act the College is required to exercise due diligence in ensuring that its employees adhere to records maintenance, retention and disposition. Security of files must be maintained at all times. Other relevant policies regarding data management and records retention, as well as access to and storage of records, must be complied with and enforced (see 7-3-1 Data Management).

There is no specific legislation governing long term retention of records for Ontario’s post-secondary educational institutions. Under FOI/POP legislation personal records must be retained as active for a minimum of 1 year following the last academic activity. A retention schedule of 55 years is consistent with legislation governing Ontario’s secondary schools. Refer to the Student Records Policy 5-2-01 for the definition of a student record.

The College period for retaining records is based upon their administrative or operational nature and other legal or regulatory requirements. Records stored in the College’s electronic Enterprise Resource Planning (ERP) system (Banner) are considered permanent; data in the system is highly integrated, and to maintain overall consistency, is not purged. Security measures and user account controls are used to limit access to data in the ERP.

College Policy:

- All College records will be retained in a safe manner for the length of time prescribed by Departmental records retention practices.
- The Department administrator is responsible for defining departmental practices and retention periods for their records. Practices must identify where the records are stored, and whether on paper or in electronic form.
- Records retention is the responsibility of the Departmental administrator identified below.
 - The College Controller (or equivalent position) is responsible for the retention of all financial records.

- The Director of Human Resources (or equivalent position) is responsible for the retention of all human resource records.
 - The Registrar is responsible for the retention of all student records and grades.
 - The Director of Facilities is responsible for the retention of all building and site plans and records.
 - The Chair of an internal College committee is responsible for the records of the committee.
 - Where the Chair of a committee is not an employee of the College (for example, Advisory Committees), the Director or Dean responsible for the School or Department is responsible for all records of the committee.
 - The Director or Dean is responsible for all other records generated by departments or operations under his/her direction unless specifically stated otherwise.
 - The academic and student records of the academic divisions, departments and the Registrar's Office, that do not fall within the scope of the College Controller or the Director of Human Resources (or equivalent position), shall be maintained by the Registrar, or Dean or Director of each school, regional campus or division/department.
 - The College Controller and the Director of Human Resources (or equivalent positions) may delegate, in writing, the maintenance and retention of records to other department administrators and shall provide direction to the other departments on the retention of records that fall under their purview but are being held by the other department.
- The Vice President – Corporate and Student Service (or equivalent) maintains this Records Retention Policy and verifies compliance by regular audits.
 - Records will be stored in a manner that prevents loss through misplacement, deterioration, accidental destruction, or theft, and unauthorized or inappropriate access. They shall be stored in a manner that ensures their continued readability and, in the case of electronic records, with the software and hardware necessary for readability. Critical documents may require duplication for business continuity purposes.
 - Electronic records are to be stored on College servers maintained by Computer Services to ensure recoverability.
 - The retention period is defined as from the date of creation for all financial, human resources, administration and e-mail records, and from the end of the semester in which the document was created for all academic records, and student records and materials.
 - All student records maintained by the Registrar must be retained during the student's presence at the College.
 - Records of any destroyed files within their purview must be maintained and retained by the College Controller, the Registrar and the Director of Human Resources (or equivalent positions). Records of the destruction of other records must be maintained and retained by the appropriate Director or Dean.

Documenting Infractions to this Policy:

The official designate responsible for the security of a record is also responsible for maintaining a log of all infractions and subsequent resolution of infractions. Further, they will complete a confidential investigation report (Appendix A) and forward a copy to the Vice President – Corporate and Student Service (or equivalent) once the matter has been resolved.



Description of the incident:

Who

What

Where

When

Findings from the investigation (including names of interviewees):

Resolution/action taken as a result of the investigation:

Completed by:

Date: