



TYPE	Administrative
NAME	Records and Information Governance Policy
DATE APPROVED BY COUNCIL	December 10, 2021

INTENT

To establish a framework to enable the College of Denturists of Ontario (CDO) to provide guidance and direction on the management of information and records to ensure the authenticity and reliability of those records for legal acceptance and to clarify staff responsibilities.

THE POLICY

To create and maintain authentic, reliable, and usable business/official records capable of supporting the CDO's business requirements for as long as they are required.

1. Purpose

The purpose of this policy is to:

- Ensure the ongoing identification, management, and preservation of records for their legal, fiscal, administrative, and historical value;
- Support the protection of sensitive information by ensuring records are managed and disposed of in an appropriate fashion;
- Improve the quality of records by evaluating and monitoring the systems;
- Ensure compliance with relevant legislation;
- Protect the CDO from the risks associated with inadvertent inappropriate destruction; and
- Educate employees of this policy and related records and information management procedures and practices.

2. Scope

This policy applies to:

- All records, regardless of the medium (e.g. paper, digital, email, tape) or location (e.g. on-site, commercial storage facility, cloud) in which they are held; and
- All agents of the CDO including employees, elected officials, Council and committee members, students, and contracted service providers involved in the provision of information management services or who have access to records under their custody and control in the course of their duties.

3. Policy Governance Activities

3.1. Program Mandate

The CDO will adhere to all applicable Canadian Federal and Provincial statutory and regulatory

requirements with respect to records and will make all reasonable efforts to conform to Records and Information Management industry standards and best practices. Recordkeeping practices based on standards and best practice support the management of records that are accurate, reliable, authentic, and available to be accessed and audited as required.

3.2. Records Ownership

All records created, acquired, and used by an agent in the course of their official duties, regardless of their source, media, format, or location, remain the property of the CDO and must be managed in compliance with policies and procedures.

3.3. Records Classification Scheme and Retention Schedule

Records will be identified by and retained according to the approved, functionally based, record classification scheme and retention schedule throughout the record life cycle.

3.4. Retention and Disposition

Records will be disposed of only when all retention requirements have been satisfied and will be destroyed in accordance with CDO's approved Retention Schedule.

Records will be disposed in a manner appropriate for the security and privacy restrictions of the information contained in the records. All records on all media, including electronic and digital images, must be capable of being completely eliminated or destroyed, such that all evidence of the record, in whole or in part, is obliterated. Department/program managers will be informed of a pending destruction and will authorize the destruction in a timely manner.

3.5. Historical (Archival) Records

Records of historical interest will be identified and captured so as to ensure that the institutional memory is available for future generations.

3.6. Suspension of Disposition

The Registrar and CEO has the authority to suspend scheduled record destruction when required to address legal, compliance or other issues whether on-site or off-site, including cloud storage. The Registrar and CEO also has the authority to restart destruction after required records have been identified and retained for potential future use.

3.7. Off-site Records Storage

Records stored in off-site repositories such as inactive records centres and cloud-based systems are expected to comply with the requirements identified in this Records and Information Management policy.

3.8. Use of Imaging and Electronic Records

Imaged and electronic records are acceptable as records and can fulfill evidentiary requirements if they are created and maintained according to acceptable standards and can meet legal criteria. The creation of imaged and electronic records and management through their lifecycle are guided by the applicable Canadian General Standards Board Standard Electronic Records as Documentary Evidence (CAN/CGSB 72.34-2017).

3.9. External Service Providers

External, third-party service providers are required to comply with this policy and related procedures if

they will be creating, using, and storing CDO records. This requirement is to be included in any contractual document. The external service provider should be able and prepared to demonstrate proof of compliance. The CDO must have the right to audit and inspect its records and information, document deficiencies, and take action(s) to resolve any identified issues.

4. Roles and Responsibilities

4.1. Management Team

The Management Team comprises the Registrar and CEO, and departmental/program managers. The Management Team will:

- Adopt, endorse, and actively support this policy and the associated recordkeeping practices;
- Advise the Registrar and CEO of new or amended legislation and policies under their department's business that may have an impact on records and information management policies, procedures and practices;
- Provide advice on retention timeframes as required;
- Provide approval for the destruction of records;
- Address non-compliance with this Policy and all related practices and procedures.
- Follow this Policy and any related practices and procedures for all records in the department's custody;
- Retain all records in the department's custody unless destruction is authorized by the Retention Schedule;
- Ensure employees understand and apply effective information management in day-to-day operations and that these responsibilities are included in performance objectives;
- Identify and advise of training needs of departmental staff; and
- Notify through appropriate management channels (i.e. Registrar and CEO) regarding the need to suspend destruction of any records that may potentially be required for litigation, compliance, regulatory or other need (i.e. Legal Hold).

4.2. Manager, Council and Corporate Services

The Manager, Council and Corporate Services will:

- Develop, maintain, and operationalize the Records and Information Management Program and its practices and procedures;
- Ensure that services are in place to implement the Program;
- Provide advice, support, and training to staff and agents as they fulfill their roles and responsibilities;
- Create and maintain the Records Classification and Retention Schedule; and
- Monitor and audit the Program.

4.3. Employees

All employees will:

- Keep accurate, complete, and up-to-date records in accordance with this Policy and the Records and Information Management Program practices and procedures;
- Classify all records according to the Records Classification and Retention Schedule;
- Maintain records in their custody or control until authorized to dispose of them under the approved Records Classification and Retention Schedule; and
- Treat departmental information in a manner that facilitates access while ensuring privacy and security requirements are met.

4.4. Information Technology

The CDO's Information Technology provider(s) will:

- Establish, maintain, and support electronic information systems that include system controls to ensure the security, accuracy, trustworthiness, reliability, quality, and integrity of electronic data and records the systems produce;
- Manage access and permissions to electronic records repositories to comply with confidentiality and privacy requirements;
- Maintain access to and dispose of all stored electronic records in accordance with the Retention Schedule; and
- Prior to the acquisition of new systems, perform migration or conversion of records to alternate media or systems, or decommissioning of systems to ensure that the original content, context, and structure of these records are maintained and preserved.

5. **Definitions**

5.1. Agent

"Agent" means any individual, workgroup, or organization responsible for, or involved in, record creation, capture and/or records management processes. (ISO15489 – 2016)

5.2. Classification Scheme

A predetermined hierarchy or scheme of consistent terminology aiding in the searching of documents. It is usually combined with a retention schedule.

5.3. Record

"Recorded information in whatever physical format created, collected or received in the initiation, conduct or completion of an activity which has content, context and structure, is authoritative and reliable and provides evidence of decision-making" (ISO15489). Records can include books, papers, maps, electronic documents, digital, video, voice recordings, web pages, etc.

5.4. Official Record

Recorded information in whatever physical format created in order to:

- support business operations; or document and provide evidence of business transactions
- comply with required legislation
- protect the rights of staff, members, and stakeholders; or provide evidence of compliance with accountability or other business requirements

5.5. Transitory Record

A record useful for only a short time and has minor importance. When its use is over, it should be deleted or destroyed. A transitory record can be destroyed at any time before the retention period of the original document as the official or original document is subject to the approved retention schedule.

5.6. Records Retention Schedule

Serves to identify and document: official records; approved records retention periods, and the mode of disposal, i.e. expunge, destruction, or transfer to storage facility.

5.7. Retention Period

The period of time which records must be kept by CDO before they may be disposed. This time-period is

based on the records’ operational, fiscal, legal, archival, and regulatory values.

5.8. Historical (Archival) Records

Records of historical value that must be protected to ensure readability of the information for future generations.

RELATED LEGISLATION AND DOCUMENTS

Classification Scheme and Retention Schedule

Legal Citation Table – CDO Record Keeping Requirements

[National Standard of Canada – Electronic Records as Documentary Evidence \(CAN/CGSB-72.34-2017E\)](#)

[International Organization for Standardization – Information and Documentation – Records Management \(ISO 15489\)](#)

REVISION CONTROL

Date	Revision	Effective