



## RECORDS RETENTION/DESTRUCTION

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<b>POLICY NUMBER</b>	<b>ADM 02-3</b>
<b>AUTHORITY</b>	<b>PRESIDENT'S COUNCIL</b>
<b>PRIMARY CONTACT</b>	<b>PRIVACY AND ACCESS OFFICER</b>

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### I. POLICY

1. The University seeks to retain, manage and dispose of Records (as defined in the Regulations set out below) in an effective and efficient manner. All Records should be managed in a systematic manner, in compliance with applicable laws and University policies. Faculty or staff leaving the University or changing positions within the University must leave all Records for their successors.
2. The intent of this Policy is that Records should be retained only as long as necessary to meet statutory, fiscal, contractual, administrative, and operational requirements. University faculty, staff, and service providers must ensure that Records for which they are responsible are accurate, complete, and are retained for the periods of time indicated in the Regulations, and thereafter disposed of in accordance with the Regulations.
3. Records must be managed and disposed of in a manner appropriate to the sensitivity of the information contained in the Record. Accordingly, it is the responsibility of faculty, staff, and service providers to ensure that the University's [Information Classification Standard](#) is observed when maintaining and disposing of Records. When a Record is Destroyed (as defined in the Regulations set out below), care must be taken to ensure that all personal and confidential information contained in such Record is Destroyed in a permanent and secure manner.

### II. REGULATIONS

1. **Application.** This Policy applies to all departments within the University, to all Records, and to all faculty and staff who create, receive or maintain Records in the

course of their duties for the University, except archival Records retained by the University library for historic purposes. This Policy also applies to all service providers to the University who create, receive or maintain Records on behalf of the University. This Policy does not apply to Records that are subject to solicitor-client privilege.

2. **Retention Periods.** Records must be retained for the periods of time set out in the Records Retention Schedule (as described below). For clarity, unless otherwise specified, the periods of time indicated in the Records Retention Schedule should be calculated from the later of:
  - a. the time the relevant Record is created or received;
  - b. the last date the relevant Record is used in the course of a faculty, staff, or service provider's duties to the University, or to make any determination about a student or other individual at the University; and
  - c. in the case of any Record evidencing a contract, agreement or continuing obligation, the expiration, termination or completion of such contract, agreement or obligation.
3. **Responsibility for Retention.** Unless otherwise listed in the Records Retention Schedule and subject to Section 4 below, Records must be retained by the department in which they were received or created.
4. **Retention of Internal Communications.** For internal communications at the University where both the sender/creator and recipient are University employees, the sender/creator is required to retain the Record.
5. **Records in Electronic Systems.** Where Records are created in an electronic system utilized by multiple departments, the department responsible for control and maintenance of the electronic system is required to retain the Records contained in the electronic system.
6. **Print Records.** Records need not be retained in printed form but may be stored in electronic format.
7. **Only in Canada.** All Records containing personal information must be stored and accessed only in Canada unless the University's Privacy and Access Officer or General Counsel has approved them being stored or accessed from outside Canada.
8. **Duplicate Copies.** Where Records are to be kept permanently, duplicate Records of any kind, not used as working copies, should be Destroyed keeping only one copy.

9. **Default Retention – 7 Years.** Any Record not captured in the Records Retention Schedule, other than Transitory Records, must be retained for a period of seven (7) years.
10. **Multiple Retention Periods.** In the event the Records Retention Schedule could be interpreted to indicate more than one period of retention for any particular Record, such Record must be retained for the longest period so indicated in the Records Retention Schedule.
11. **Transitory Records Retention.** Transitory Records (defined below) should be retained only while there is an operational need to retain the Record and should be Destroyed before the end of period indicated in the Records Retention Schedule for the category of Record.
12. **Destruction of Records.** Records that have been retained for the period indicated in the Records Retention Schedule should be Destroyed promptly at the end of that period. Prior to any Record being Destroyed, written approval must be given by a Dean, Director or more senior officer of the University. Where the destruction has been carried out by third parties, written verification of such destruction should be obtained from the third party.
13. **Non-Destruction of Records.** Legal requirements supersede any University policies authorizing destruction of Records, including the written approval granted above. If the content of a Record is related to actual or threatened litigation, or if the University has received a request for access to information contained in a Record, the Record must not be Destroyed without the written permission of the General Counsel of the University.
14. **Listing of Destroyed Records.** Each department must maintain a listing of all Records Destroyed, other than Transitory Records. Such listing must include the category of Records from the Records Retention Schedule, a brief description of the categories of Records (individual records need not be listed), the years in which the Records were created, and the method used to Destroy the Records.
15. **Transitional Provision:** This Policy shall be effective upon approval. All Records must be reviewed prior to March 31, 2017 and any Records existing beyond the period indicated in the Records Retention Schedule must be Destroyed by June 30, 2017. This Transition Provision shall be deleted from these Regulations on March 31, 2018.
16. **Definitions**
  - a. **“Correspondence”** means any communication between two or more individuals.
  - b. **“Destroy”** means to eliminate or delete Records beyond any possible reconstruction including through: (i) physical destruction by means of

burning, pulping or shredding; (ii) secure deletion of electronic Records; or (iii) physical destruction of electronic storage media.

- c. **“Record”** means recorded information, regardless of medium or form, which the University creates, receives or maintains in connection with the conduct of the University’s affairs. Emails and other forms of electronic messages are examples of Records.
  - d. **“Transitory Records”** means Records which are only required for a limited period of time for the completion of a routine action or the preparation of an ongoing Record. It is a Record’s content and context that determines whether a Record is transitory, rather than its form. Examples of Transitory Records include: working documents, such as drafts or preliminary versions; committee agendas and minutes held by committee members other than committee chair/secretary; copies of Records retained when the original is sent to another department (e.g. copy of invoice when original sent to Finance for payment); “cc” “bcc” or FYI copies kept for convenience or information; routine text messages, voicemails and recordings of voice messages; and routine emails to schedule or confirm meetings or events.
17. **Records Retention Schedule.** The Privacy and Access Officer shall establish a [Records Retention Schedule](#) in accordance with this Policy and is responsible for:
- a. maintaining and publishing the Records Retention Schedule on the TRU website for access by all departments;
  - b. reviewing the Records Retention Schedule periodically and updating it as required;
  - c. notifying affected departments of updates; and
  - d. retaining copies of all previous versions of the Records Retention Schedule and a Record of the period during which each was in effect.