

Policy Title:	Record Management, Retention and Destruction		
Category:	<input type="checkbox"/> Institutional - Board	<input type="checkbox"/> Academic - Administrative	
	<input checked="" type="checkbox"/> Institutional - Administrative	<input type="checkbox"/> Employment - Administrative	
Approved by:	<input type="checkbox"/> Board	<input checked="" type="checkbox"/> President	
Date approved:	December 8, 2016	Effective date:	December 8, 2016
Policy Sponsor:	Vice President, Administration & Finance	Date last reviewed:	December 8, 2016
Date of Mandatory Review (expiry date)	December 2021	Date of last revision of Procedures	December 8, 2016

1 POLICY

1. CMCC records are the property of the institution and will be retained to meet statutory, fiscal, contractual, and operational requirements. Employees are responsible for being aware of and adhering to the Records Retention Schedule, as set out in Schedule A to this policy. It is acknowledged that there may be changes to statutory and/or regulatory obligations relating to the maintaining of records, and that the Records Retention Schedule shall be amended from time to time to reflect compliance with ongoing statutory and or regulatory obligations.
2. Records with enduring evidential or historical value will be preserved as part of CMCC's archives, paper or digital, or digitally on CMCC's document management system.
3. Convenience copies of records should be securely destroyed when they no longer have business value.
4. Electronic documents will be retained as if they were paper documents. If there are electronic version of paper documents, the paper documents may be appropriately destroyed.
5. Any paper records that contain personal information should be classified as confidential and shredded to protect the privacy of employees, students, customers, patients and other appropriate and/or relevant individuals.
6. CMCC's records, whether onsite or off-site, will be stored in a safe, secure, confidential and accessible manner. Documents and financial files that are essential to keeping CMCC operating in an emergency will be duplicated or backed up at least every week and maintained offsite or be remotely accessible.
7. Electronic records will be migrated to a digital archive or document management system that can provide secure access for regulatory, legal or future business purposes.
8. The President may identify specified records to be placed on a legal hold, suspending the destruction of records due to pending, threatened, or otherwise reasonably foreseeable litigation, audits, government investigations or similar proceedings. In such case, no records specified in any legal hold may be destroyed even if the scheduled destruction date has passed, until the legal hold is withdrawn by the President, in writing.

9. Records that have met the required retention period will be securely destroyed in a manner that ensures the protection of personal, confidential, and proprietary institutional information.

2 PURPOSE

To identify the institutional parameters for the management, storage and destruction of CMCC's documents and records, regardless of their form.

3 SCOPE

All records created, received or maintained by CMCC employees in the course of carrying out the activities of the institution, regardless of: physical form; guidelines for how long certain documents should be kept both for legislated and archival purposes; and how records should be permanently deleted or destroyed.

4 INFORMATION AND COMPLIANCE PLANS (not a comprehensive list)

Records may exist in any form, including text, numeric, graphic, and sound, or a combination of these, and on any medium, such as paper, magnetic media (e.g., hard disks, floppy disks, flash memory devices, magnetic computer tapes, audio and videotapes), optical media (e.g., CDs, DVDs, optical jukeboxes), and micro media (microfilm or microfiche).

The following is a list which is not necessarily comprehensive of statutes, regulations or policies relating to the obtaining, maintaining and destruction of business records:

- *Anatomy Act – RRO 1990, Regulation 21, Section 2*
- *Business Corporations Act of Ontario – Part XI: Books and Records*
- *Canada Revenue Agency Income Tax Information Circular # IC78-10R5: Books and Record Retention/Destruction*
- *College of Chiropractors of Ontario Standard of Practice S002 – Record Keeping*
- *Electronic Commerce Act of Ontario*
- *Employment Standards Act – Part VI: Records*
- *Personal Health Information Protection Act (PHIPA) – Part II: Practices To Protect Personal Health Information*
- *Personal Information and Electronic Documents Act (PIPEDA) – Principle 5: Limiting Use, Disclosure, and Retention*
- *Postsecondary Education Choice and Excellence Act – Ontario Regulation 279/02: Transcript Standards*
- *Requirements for the Approval of Private Institutions Providing Postsecondary Education Programs in Ontario for the Purposes of Ontario Student Grants and Ontario Student Loans and for the Administration of the Ontario Student Assistance Program by Approved Private Institutions (The “Performance Requirements”) – Version 11, June 2017; Appendix 3: OSAP Administrative Procedures; Appendix 4: Confidentiality Requirements*

5 RELATED POLICIES (not a comprehensive list)

- Privacy

6 DEFINITIONS

Archives are records that are likely to have continuing historical or evidential value. The originating unit will transfer custody and control of the records in their entirety to the Archives Librarian or save them in CMCC's document management system.

An electronic image is defined as a digital representation of a CMCC record, regardless of the original format or medium.

An electronic record is a CMCC record, including a record created or received in a digital image format, which requires a computer or other digital device to read, perceive, or hear.

Document refers to paper or electronic.

Records defines information, regardless of format or medium, which is created, received, and maintained by CMCC and which provides evidence of its transactions or activities.

Records management is defined as an efficient, orderly, and systematic approach to the creation, receipt, use, and disposition of records, including processes for capturing and maintaining evidence and information about activities and transactions in the form of records.

A Records Retention Schedule is a comprehensive instruction to ensure that records are retained for as long as necessary based on their operational, fiscal, legal, and historical value, and are disposed of in an authorized manner at the end of the retention period.

New Policy Approved (date):

Retention of Records - July 2004

Policy Revision History (dates):

Record Management, Retention and Destruction – December 8, 2016

7 PROCEDURES

1. Draft documents should be disposed of as soon as they have been superseded by an official version unless there shall be a specific purpose for the maintaining of the draft document as, for example, in the case of contractual negotiations, if appropriate.
2. The Director of Facilities, Safety & Security and the Director of Information Technology shall establish and maintain adequate procedures to ensure security and control over the authorized access to, maintenance of, and destruction of the respective records entrusted to them for safekeeping. A log will be maintained by the Director of Facilities, Safety & Security which sets out the nature, content and timing of the destruction of records.
3. The Chief Privacy Officer will review such procedures on a regular basis to ensure that they are in keeping with best practices identified in relevant privacy legislation.

4. The Director of Facilities, Safety & Security, for paper records, and the Director of Information Technology, for electronic records, are responsible for the identification of records that have met the required retention period for their destruction.
5. The Director of Human Resources will ensure that management staff are directed to and understand their obligations for the retention and destruction of institutional records under their control, in accordance with current policy and procedures.
6. Employees in a management capacity will ensure that employees working with them understand (being consistent with Procedure #5) their obligations with respect to the management of institutional records they work with in the normal course of their employment.

New Procedure (date):

Retention of Records - July 2004

Procedure Revision History (dates):

Record Management, Retention and Destruction – December 8, 2016

8 ATTACHMENTS

Records Retention Schedule



Records Retention Schedule

Record Category	Minimum Retention Period	Location
Corporate Records		
By Laws and Articles of Incorporation	Permanent	Executive Offices
Supplementary	Permanent	Executive Offices
Corporate Resolutions	Permanent	Executive Offices
Board and committee meeting agendas, documentation and minutes	Permanent	Executive Offices
Board of Governors - Conflict of Interest Disclosure Forms	4 years	Executive Offices
Contracts and Agreements	7 years after all obligations end	Executive Offices
Annual Return – Directors (ONCORP)	7 years	Executive Offices
Organization Charts	Permanent	Executive Offices
Finance and Administration		
Audited Financial Statements	7 years	Executive – Financial Services
Auditor Management Letters	7 years	Financial Services
Payroll Records	7 years	Human Resources
Disbursement Register	7 years	Financial Services
Government Submissions	7 years	Executive or Financial Services or Human Resources
Bank deposits and statements	7 years	Financial Services
Accounts Payable – cheque copies and supporting documentation	7 years	Financial Services
General Ledgers and Journals, including bank reconciliations	7 years	Financial Services
Chart of Accounts	7 years	Financial Services
Investment Reports	Permanent	Executive (Board documents) – Financial Services
HST/Sales Tax Filings	7 years	Financial Services
Annual Report	Permanent	Library Archives
Request for Proposals – responses which were not accepted	1 year following the year of submission	All Divisions
Accreditation		
Accreditation Award Notification (MTCU and Federation)	Permanent	Executive Offices
Self Study	Permanent	Archives – IPA
Update to the Self Study	Permanent	Archives – IPA
Report of a Site Visit Team	Permanent	Archives – IPA
Response to a Report of a Site Visit Team	Permanent	Archives – IPA
Report of a Special Site Visit	Permanent	Archives – IPA
CMCC's Response to a Report of a Special Site Visit	Permanent	Archives – IPA
Application for Ministerial Consent	Permanent (can be reconsidered for original applications following 2021 renewal application)	IPA
International Student Program Designation	Permanent	Executive – VP, Admin & Finance
OSAP Designation/Approval	Permanent	Executive – VP, Admin & Finance

Schedule A

Record Category	Minimum Retention Period	Location
Insurance Records		
Insurance Policies	Permanent (cover letter, front page and riders only) 2 years for full binder	Executive – VP, Admin & Finance
Incident Reports	5 years from when CMCC knew or ought to have known about it OR from the date of the age of majority of the person involved, then a summary list	Executive Offices
JHSC Annual Reports	7 years	Executive Offices
Group Insurance – Disability records	7 years after end of benefits	Human Resources
CCPA Coverage Letter / annual invoice	Permanent	Executive – VP, Admin & Finance
Real Estate		
Deeds	Permanent	Executive – VP, Admin & Finance
Leases (expired)	7 years after all obligations met	Executive – VP, Admin & Finance
Mortgages, security agreements	7 years after obligations end	Executive – VP, Admin & Finance
Building Plans/drawings and subsequent modifications	Permanent	Facilities
Inspection Reports – provincial, federal, municipal	Permanent	Facilities
Tax		
CRA Registration	Permanent	Executive – VP, Admin & Finance
IRS Exemption	Permanent	Executive – VP, Admin & Finance
Charitable Organization Returns	7 years	Financial Services
IRS Form 990's	7 years	Financial Services
Human Resources		
Personnel Files (HR Files)	Permanent	Human Resources
Benefit Booklets	Permanent	Human Resources
Employment Policies	Permanent	Human Resources
Employee Orientation and Training Materials	7 years after use ends	Human Resources
Employment Applications	3 years	Human Resources
Time and Attendance Records	3 years	Human Resources
Group RRSP – description of plans	Permanent	Human Resources
CUPE Agreements	Permanent	Human Resources
Information Technology		
Software Licenses and Support Agreements	7 years after all obligations end	IT
Documentation on Systems Development, including subsequent modifications	7 years after system suspended	IT
Student Services		
Applications to CMCC - unsuccessful	1 year	Student Services
Academic Records (Admissions Application; Registration Forms; Awards documentation; Decisions on Appeals and Re-reads; Withdrawal and Leave, of Absence Approvals; Discipline Board Decisions; Promotion Letters; Grade Reports; and final transcript)	Permanent	Student Services
Decisions on Students Discipline	Permanent	Student Services

Record Category	Minimum Retention Period	Location
Student Transcripts	Minimum 75 years after last year of registration	Student Services
Personal documentation relating to accommodations, appeals and petitions	10 years	Student Services
Convocation Program	Permanent	Archives – Student Services
Graduation Register	Permanent	Student Services
Ontario Student Assistance Plan (OSAP)	Current year plus 2 prior years	Student Services
Yearbook	Yearbook	Archives – Student Services
Out of province Financial Aid	In accordance with jurisdictional guidelines as reflected in divisional procedures	Student Services
Educational Services		
Academic Calendar	Permanent	Archives
Undergraduate Schedule (Schut)	Permanent	Undergrad
Course Syllabi	Permanent	Archives – Undergrad
Academic Policies	Permanent	Student Services
Academic Agreements – Affiliation; Articulation; Collaboration; Consortial, etc.	Permanent	Executive Offices
Anatomy – Human Dissection: 1. Every certificate for anatomical dissection of an unclaimed body received by the school. 2. Every certificate for anatomical dissection of a donated body received by the school. 3. A copy of every receipt for a body completed by the school. 4. Every notice of disposal of a body completed by the school. 5. Every identification tag attached to a body received by the school. 6. An antero posterior photograph and a lateral photograph of the face of each unclaimed body received by the school. 7. A complete set of fingerprints of each unclaimed body received by the school. O. Reg. 258/99, s. 1. 8. Every consent given under the <i>Human Tissue Gift Act</i> for use after death of a body received by the school. 9. The burial permit required in connection with the disposal of a body under the <i>Vital Statistics Act</i> . O. Reg. 258/99, s.1.	10 years after cremation or return of remains	Undergrad
Examinations: Master Copy + Answer Sheet +2 examples of each of student papers for high, mid, and low achievements	10 years	Undergrad
Students Examination Papers	1 year following year when exam was written, or if pertinent to an ongoing procedural matter, the individual's exam would be kept until that matter is settled	Undergrad

Schedule A

Record Category	Minimum Retention Period	Location
Clinical Education & Patient Care		
Clinician Manual	7 years	Clinic
Interns' Manual	Permanent	Clinic
Patient Files	7 years after last visit or 7 years after a minor patient reaches the age of majority	Clinic
Intern's Workbooks	1 year following graduation	Clinic
Grant Records		
Original Grant Proposal	7 years after completion of grant	Research
Grant Award Letter	7 years after grant completion	Research
Grant Agreement and subsequent Modifications, if any	7 years after grant completion	Research
Financial Grant Reports, both financial and written	7 years after grant completion	Research
All evidence of returned grant funds	7 years after grant completion	Research
Documentation to support grantee compliance with grant agreement (invoices, charges, letters, etc.)	7 years after grant completion	Research
Grant applications (not successful)	7 years after submission year	Research
Records regarding research governed by the <i>Food and Drug Act</i>	25 years after grant completion	Research
Donor Records (incl. membership)		
Charitable Receipts	7 years	Development