



KWANLIN DÜN FIRST NATION

RECORDS MANAGEMENT POLICY

June 9, 2015

1.0 Definitions

Active Records – **records** that are required for day to day operations of Kwanlin Dün First Nation and kept in the office that created them

Archives, or Archival Facility - An agency responsible for selecting, acquiring, preserving, and making available records of government, individuals, organizations and other groups that have enduring, historical value

Classification – the identification and arrangement of records into categories according to logically structured conventions, methods and procedural rules. Classifying records makes both retrieval and **retention scheduling** easier

Confidential Information – information that, if disclosed, could harm the privacy of individuals, the Kwanlin Dün First Nation as a government, its membership as a whole, or the commercial or financial interests of a third party. Confidential information is subject to rigorous security measures.

Destruction – the process of eliminating or deleting records. The method of destruction depends on the format of the record (paper or electronic) and whether or not it contains **confidential information**.

Disposition, or Final Disposition – the actions taken in regards to records that have met their retention requirements and are no longer needed by Kwanlin Dün. Records are appraised for their archival value and final **disposition** is designated to be either a) destruction or b) transfer to an **archival facility**. Disposition is set out in appraisal reports and/or **retention schedules**.

Document – recorded information or object (e.g. photo, map, drawing, etc.) that can be treated as a unit

Electronic records – data and information created, manipulated and stored on electronic media

Final Disposition – see *Disposition*

Inactive Records – records that are no longer frequently used for operational purposes but are preserved for legal or fiscal purposes and kept in a storage space or facility.

Permanent Records – records that have been designated for continuous maintenance by the First Nation because of their permanent operational, legal, fiscal, reference or other value.

Physical Control – the function of tracking the physical location of records so they can be retrieved when needed

Qualifying Person – defined in the *Freedom of Information and Protection of Privacy Act* (in development), means an individual other than a citizen whom the privacy officer determines to be directly and significantly affected by information contained in a record in the custody of, or under the control of, the Kwanlin Dün First Nation, including employees, non-citizen family members of citizens and legal guardians

Records – all information created, received and maintained by an organization in pursuance of legal obligations or in the transaction of business, including documents, maps, digital files, drawings, photographs, database records, email messages, letters, ledgers, and any other item on which information is recorded or stored by graphic, electronic, mechanical or other means. Does not include computer programs or any mechanism that produces records.

Records and Information Management (RIM) – the field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and **disposition** of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records, including the basic instruments of records **classification, retention**, storage and security.

Records Lifecycle – the distinct phases of a record’s existence from initial creation to its **final disposition**. The records lifecycle is divided into three stages: **active, inactive**, and **final disposition**

Records Retention and Disposition Schedule (Records Schedule, Retention Schedule or Schedule for short) – a comprehensive list of **record series** titles, indicating the length of time each series is to be maintained in office, in inactive storage, and when it is eligible for **final disposition**, whether that be **destruction**, permanent retention or formal transfer to an **archives** for permanent preservation.

Record Series – the basic unit for organizing and controlling files. Series are those file units or documents kept together because they relate to a particular subject or function, result from the same activity, document a specific type of transaction, take a particular physical form, or have some other relationship arising out of their creation, receipt, maintenance, or use. Each record series should be located separately from all other records. The determination of how long a series is kept **active** in office, **inactive** in storage, and when it can be disposed of, is covered by a **retention schedule**.

Retention – see *Records Retention and Disposition Schedule*

2.0 Scope

2.1 This policy applies to:

- All records created or received by employees, elected officials, contractors, consultants and others providing services to or acting on Kwanlin Dün First Nation's (KDFN's) behalf
- Records in all formats (paper, digital, audio-visual, and graphic), which are the property of the First Nation and subject to its overall control
- All sites, facilities, equipment, services to collect, manipulate, transport, transmit or keep corporate information.

2.2 The scope of the KDFN Records and Information Management (RIM) Program includes oversight of the maintenance and housing of records, preparation and issuance of approved retention schedules, operation of records storage facilities, the utilization of applicable technologies, and the establishment of appropriate procedures and practices to enable KDFN departments to manage their records efficiently and effectively.

3.0 Purpose

The purpose of this policy is:

- 3.1 To define and implement a Records and Information Management (RIM) Program for Kwanlin Dün First Nation (KDFN) in order to ensure that authentic, reliable and usable records are created, managed, preserved and available regardless of format, in order to:
- protect Kwanlin Dün's legal and fiscal interests;
 - provide access to information to KDFN citizens and qualifying persons;
 - protect the privacy and other rights of individual citizens.
- 3.2 To support the understanding that records and information are assets and resources that help employees deliver government services and programs and support departments' operations. Records and information are essential to the business of Kwanlin Dün First Nation and must be protected and managed to comply with legislative requirements and generally accepted standards.
- 3.3 To ensure the accountability of the Kwanlin Dün First Nation government to Kwanlin Dün citizens by protecting and preserving the records that document decisions made by government and record the rights of governments, corporations, organizations and individuals.

3.4 To promote economy and efficiency in the creation, maintenance, storage, retrieval and disposal of KDFN records. Economy will be achieved through the disposal, non-retention, or non-creation of documents that duplicate existing records or have no continuing role or value in relation to a department's functions.

4.0 Policy

4.1 All records created, received and maintained by Kwanlin Dün employees, elected officials, contractors, consultants and others providing services to or acting on Kwanlin Dün First Nation's behalf, regardless of the records' source, format or location, are the physical and intellectual property of Kwanlin Dün First Nation.

4.2 The effective creation and management of KDFN records is a responsibility shared by all KDFN employees in accordance with specified policies, procedures and best practices. The Records and Information Management Program includes procedures directing the capture, classification, scheduling, storage, retention, destruction and security of records, and supporting the protection of privacy throughout the organization.

4.2 Records retention and disposition schedules define the length of time that specified types of records will be retained in their active and inactive phases and then destroyed or designated for permanent retention or archival preservation (final disposition). Retention is based on operational requirements and legal, regulatory, administrative, and historic values of records. Records schedules are developed by Information and Records Management and departmental staff, and approved by the Executive Director. No records may be destroyed without an approved retention schedule and disposal approval from the appropriate department head.

4.3 Electronic records are a routine part of business operations and must be managed like any other record. Employees will ensure that electronic records, including email messages, are accessible and secure for the duration of the records' scheduled lifecycle. Security includes both the protection of confidential information and the assurance that data within the records cannot and has not been altered. Given the enormous volume of email, employees will be proactive in weeding out transitory emails that do not need to take up space on the network and make retrieval more difficult (see Transitory Records Policy, in development).

4.4 Tracking controls are implemented as part of the RIM Program to maintain physical control over records in storage and document records that are destroyed.

5.0 Roles and Responsibilities

Employees

- Create and maintain records necessary to document their official activities and decisions
- Treat official government records as a corporate resource and manage them in compliance with the policies, procedures and best practices of the Records and Information Management (RIM) Program
- Ensure that records are properly stored on network drives and can be easily retrieved
- Only destroy records in accordance with approved records retention schedules, policies and procedures
- Never remove records from government property without approval

Department Heads

- Ensure that departmental programs adequately document the organization, functions, policies, decisions, procedures, and essential transactions of Kwanlin Dün First Nation
- Ensure that the information produced and maintained by employees is accurate, accessible and managed in compliance with RIM Program policies, procedures and best practices
- Liaise with Information and Records Management regarding requirements for managing the records within their respective departments, including but not limited to the development and revision of classification schemes and records retention schedules
- Ensure that personal information is only collected from individuals when it relates directly to and is necessary for operating a program or activity, and manage personal information in accordance with the provisions set out in the *Freedom of Information and Protection of Privacy Act* (in development)
- Authorize the transfer and disposition of department records that have fulfilled retention requirements as set out in a retention schedule

Information and Records Management unit

- Develop and maintain policies, standards, procedures and guidelines related to records and information management
- Provide a framework for the management and control of the use, access, storage, maintenance, retention and disposition of all government records in all formats
- Provide regular records and information management training for KDFN staff
- Advise and assist departments and users with the development, implementation and maintenance of the systems and processes put in place by the RIM Program

- Develop and implement administrative and operational classification schemes and retention schedules in all departments
- Liaise with the Information Technology unit concerning the appropriate creation, use, maintenance and disposition of KDFN electronic records
- Facilitate and maintain services for the storage of records
- Coordinate and track approved records transfer and disposal

Information Technology unit

- Work with Information and Records Management on the lifecycle management of Kwanlin Dün’s electronic records, including but not limited to those stored on network drives and in databases. This includes management of the creation, organization, storage and disposition of electronic records.

Executive Director

- Review draft retention schedules and provide feedback to the Information and Records Management unit
- Provide final approval of retention schedules

6.0 Privacy and Confidentiality

- 6.1 It is the responsibility of everyone working on behalf of the Kwanlin Dün First Nation to ensure that appropriate measures are followed when collecting and maintaining personal or other confidential information, in accordance with the provisions set out in the Freedom of Information and Protection of Privacy Act (in development).
- 6.2 When records containing personal or confidential information are scheduled to be destroyed, shredding, burning or other appropriate methods of disposal must be used to ensure that information is not disclosed.
- 6.3 Confidentiality and security of information is a condition of employment and everyone employed by or conducting business on behalf of KDFN who collects, uses, discloses or has access to confidential information as part of his/her job duties is required to sign a confidentiality agreement. Confidential information is not to be transmitted verbally if conversations can be overheard or intercepted.

7.0 Access to Information

- 7.1 Access to Kwanlin Dün First Nation's records is a general right of Kwanlin Dün citizens and is prescribed in the *Freedom of Information and Protection of Privacy Act* (in development).
- 7.2 Service providers must comply with the Records Management Policy and IT Security policies. Access to Kwanlin Dün's IT systems will only occur once a contract has been signed between KDFN and the service provider.

8.0 Compliance

- 8.1 Users who have willingly or knowingly breached this policy may be subject to disciplinary action as outlined in the KDFN Personnel Policy 7.2 on Discipline, up to and including termination of employment.