



KWANLIN DÜN FIRST NATION
Records Management Policy

Amended on June 13, 2018



KWANLIN DÜN FIRST NATION Records Management Policy

1.0 Definitions

In this policy

- “active records” means 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” means an agency responsible for selecting, acquiring, preserving, and making available records of government, individuals, organizations and other groups that have enduring, historical value;
- “classification” means 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” means 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” means 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” means the actions taken in regards to records that have met their retention requirements and are no longer needed by the Kwanlin Dün First Nation. 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” means any individually-created grouping of information that is treated as a unit, e.g., a Word document, Excel spreadsheet, Outlook email, photograph, map, drawing, etc.;
- “electronic records” means data and information created, manipulated and stored on electronic media;
- “final disposition” (see *Disposition*);
- “inactive records” means older records that do not have to be readily available but that have to be kept longer (if paper, often in storage) because they still have legal, financial, or historical value;



KWANLIN DÜN FIRST NATION Records Management Policy

- “permanent records” means records that have been designated for continuous maintenance by the Kwanlin Dün First Nation because of their permanent operational, legal, fiscal, reference or other value;
- “qualifying person” has the same meaning as defined in the *Freedom of Information and Protection of Privacy Act* (Kwanlin Dün First Nation) (in development) and 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” means all information created, received and maintained by an organization as evidence 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, but does not include computer programs or any mechanism that produces records;
- “Records Classification and Retention Schedule (RCRS)” means a policy document that establishes authority for how long records must be kept and whether they are preserved or destroyed at the end of their useful life. An RCRS combines
- (a) a records classification scheme, where all categories of records are identified, described and arranged in an organized way, and
 - (b) a records retention and disposition schedule: a comprehensive list of record categories, indicating the length of time each category is to be maintained, stored, and the nature of its final disposition, whether that be destruction, permanent retention or formal transfer to an archive for appraisal and possible preservation.
- “Records and Information Management (RIM)” means 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” means the distinct phases of a record’s existence from initial creation to its final disposition. The records lifecycle is divided into three stages:
- (a) active,
 - (b) inactive, and



KWANLIN DÜN FIRST NATION Records Management Policy

(c) final disposition;

“Records Retention and Disposition Schedule” (see *Records Classification and Retention Schedule*); and

“retention” (see *Records Retention and Disposition Schedule*).

2.0 Scope

2.1 This policy applies to

- (a) all records created or received by employees, elected officials, board and committee members, contractors, consultants and others providing services to or acting on behalf of the Kwanlin Dün First Nation (KDFN);
- (b) records in all formats (paper, digital, audio-visual, and graphic), which are the property of KDFN and subject to its overall control; and
- (c) 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

- 3.1 The purpose of this policy is to define and implement a RIM program for KDFN in order to ensure that authentic, reliable and usable records are created, managed, preserved and available regardless of format, in order to
- (a) ensure the responsible management of KDFN records as valuable resources and assets;
 - (b) ensure the management of records is in accordance with legislated requirements and generally accepted standards;
 - (c) support the protection of confidential and personal information throughout the government;
 - (d) ensure the accountability of the KDFN to Kwanlin Dün citizens by protecting and preserving the records that document decisions made by government



KWANLIN DÜN FIRST NATION Records Management Policy

and record the rights of governments, corporations, organizations and individuals;

- (e) ensure preservation of records of vital or permanent value; and
- (f) promote economy and efficiency in the creation, maintenance, storage, retrieval and disposal of KDFN records.

4.0 Policy

- 4.1 All records created, received and maintained by KDFN employees, elected officials, board and committee members, contractors, consultants and others providing services to or acting on behalf of KDFN, regardless of the records' source, format or location, are the physical and intellectual property of KDFN.
- 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.
- 4.3 The RIM program ensures that the legal, regulatory, fiscal, administrative and operational recordkeeping requirements of the KDFN are met and provides all departments with the structures, standards, tools and procedures that are required for effective and compliant records management.
- 4.4 The KDFN RCRS serves two functions:
 - (a) it provides a broad filing structure (classification) for all KDFN records; and
 - (b) it is the official retention and disposition schedule that defines the length of time specified types of records will be kept.

At the end of their lifecycle files from each category of records are either destroyed or designated for permanent retention or archival selection (final disposition). Retention is based on operational requirements and legal, regulatory, administrative and historic values of records. RCRS is developed and maintained by Records Management and departmental staff and approved by department heads and the Executive Director. No records may be destroyed if they are not covered by RCRS and if the disposal is not coordinated through the Information and Records Management Unit.



KWANLIN DÜN FIRST NATION Records Management Policy

- 4.5 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 have not been altered without authorization. Given the enormous volume of e-mail, employees will be proactive in weeding out transitory e-mails that do not need to take up space on the network and make retrieval more difficult (see the Transitory Records Policy for more information).
- 4.6 Tracking controls are implemented as part of the RIM program to maintain control over records, track the circulation of and access to documents, and document records that are destroyed. KDFN records are held only in those facilities authorized by KDFN.

5.0 Roles and Responsibilities

5.1 Employees

Employees are responsible for

- (a) creating and maintaining records necessary to document their official activities and decisions;
- (b) treating official KDFN records as a corporate resource and managing them in compliance with the policies, procedures and best practices of the RIM program;
- (c) ensuring that records are properly stored on network drives and can be easily retrieved;
- (d) only destroying records in accordance with approved records retention schedules, policies and procedures; and
- (e) never removing records from KDFN property without approval.

5.2 Department Heads

Department Heads are responsible for

- (a) ensuring that departmental programs adequately document the organization, functions, policies, decisions, procedures, and essential transactions of KDFN;



KWANLIN DÜN FIRST NATION Records Management Policy

- (b) ensuring that the information produced and maintained by employees is accurate, accessible and managed in compliance with RIM program policies, procedures and best practices;
- (c) liaising 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;
- (d) ensuring that personal information is only collected from individuals when it relates directly to and is necessary for operating a program or activity, and managing personal information in accordance with the provisions set out in the *Freedom of Information and Protection of Privacy Act* (Kwanlin Dün First Nation) (in development); and
- (e) authorizing the disposition of department records that have fulfilled retention requirements as set out in the KDFN Records Classification and Retention Schedule.

5.3 Information and Records Management Unit

The Information and Records Management Unit is responsible for

- (a) developing and maintaining policies, standards, procedures and guidelines related to records and information management;
- (b) providing a framework for the management and control of the use, access, storage, maintenance, retention and disposition of all KDFN records in all formats;
- (c) providing regular records and information management training to KDFN staff;
- (d) advising and assisting departments and users with the development, implementation and maintenance of the systems and processes put in place by the RIM program;
- (e) developing and implementing classification schemes and retention schedules in all departments;
- (f) liaising with the Information Technology Unit concerning the appropriate creation, use, maintenance and disposition of KDFN electronic records;
- (g) facilitating and maintaining services for the storage of records; and
- (h) coordinating and documenting approved records transfers and disposals.



KWANLIN DÜN FIRST NATION Records Management Policy

5.4 Information Technology Unit

The Information Technology Unit is responsible for

- (a) working with Information and Records Management on the lifecycle management of KDFN'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.

5.5 Executive Director

The Executive Director is responsible for

- (a) reviewing draft retention schedules and providing feedback to the Information and Records Management Unit; and
- (b) providing final approval of retention schedules.

6.0 Privacy and Confidentiality

- 6.1 It is the responsibility of everyone working on behalf of KDFN 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* (Kwanlin Dün First Nation) (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 or her job duties is required to sign a confidentiality agreement. Confidential information must not be transmitted verbally if conversations can be overheard or intercepted.

7.0 Access to Information

- 7.1 Access to KDFN's records is a general right of Kwanlin Dün citizens and is prescribed in the *Freedom of Information and Protection of Privacy Act* (Kwanlin Dün First Nation) (in development).



KWANLIN DÜN FIRST NATION Records Management Policy

7.2 Service providers must comply with this policy and IT Security policies. Access to KDFN'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 Human Resources Policy, up to and including termination of employment.