



**KWANLIN DÜN FIRST NATION**

**TRANSITORY RECORDS POLICY AND PROCEDURES**

**November 24, 2015**

## **TRANSITORY RECORDS POLICY**

### **1.0 Definitions**

**Privacy Officer** – the employee delegated by the Executive Director with responsibility for encouraging compliance with the *Freedom of Information and Protection of Privacy Act* (in development), responding to requests for access to and correction of personal information, and general issues concerning personal information.

**Records** – all information created, received and maintained by Kwanlin Dün First Nation 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.

**Transitory Records** – records that have limited, short-term value only and will not be needed in the future. They are not needed for statutory, legal, fiscal, administrative, operational or archival purposes and are not typically filed within a standard filing system.

### **2.0 Scope**

2.1 This policy and its procedures apply to all transitory records, in all media and formats, created or received by employees, elected officials, contractors, consultants and others providing services to or acting on Kwanlin Dün First Nation's behalf.

### **3.0 Purpose**

3.1 The purpose of this policy is to define transitory records and to provide an ongoing authority to dispose of these records.

3.2 The purpose of the procedures is to outline the appropriate actions taken to fulfill this policy.

### **4.0 Policy**

4.1 Transitory records are those that have limited, short-term value only and will not be needed in the future. They are not needed for statutory, legal, fiscal, administrative, operational or archival purposes and are not typically filed within a standard filing system.

4.2 There are five categories of transitory records:

1. **Temporary information** that is required to complete a routine action, prepare an ongoing record, or was received for informational purposes only. It has little value and can be destroyed once it has been acted upon and is not required to support the operations and accountability of the program department. Examples of temporary information include telephone/voicemail messages, calendars and planners, “FYI” email messages, informal notes, and opened envelopes.

2. **Duplicate documents** are copies of documents that do not contain added, changed or deleted content or significant annotations. Examples of duplicate documents include photocopies, courtesy copies (cc) or correspondence which has no relevance to the receiving office.

3. **Draft documents and working materials** contain information that has been used to create the final version of reports, correspondence, memoranda and other records. Examples are rough notes, research notes, outlines, calculations, preliminary drafts, editing and formatting notes.

4. **Publications** include books, magazines, newspapers, brochures, journals, newsletters, posters, software and software documentation. These materials may have been developed by or for a department or may have been acquired from external sources.

5. **Advertising materials** include solicited and unsolicited information received from individuals or organizations advertising their products and services. Advertising materials include brochures, sales letters, catalogues, price lists, company profiles and similar materials.

4.3 Exceptions to the list of transitory records are made by the Information and Records Management unit. Exceptions may apply globally or be specific to departments. Exceptions include:

- notebooks, day timers, daybooks and journals when notes are used as a source for decision making or a record of actions, e.g. Council members and Directors’ notebooks, field books, nurses’ or social workers’ notebooks
- telephone messages that provide evidence of a decision or action taken
- draft documents that are important for understanding the development or importance of a final version (significant changes to content)
- drafts of policy or legislative decisions
- last draft copy when no final version has been produced
- advertising materials that are considered of significant interest or influence to the branch and its work

4.4 If there is any doubt about whether a record will be needed again for reference or other reasons, FILE the record.

## 5.0 Retention Period and Final Disposition

5.1 Under the authority of this policy, transitory records can be legally and routinely discarded when they are no longer needed. However, **any transitory record that contains information relevant to a request made under the *Freedom of Information and Protection of Privacy Act (in development)* OR that is related to an active legal action must not be destroyed until it has been reviewed by the privacy officer.**

5.2 Non-transitory (substantive) records that document Kwanlin Dün First Nation operations should be filed in a physical filing system or stored in an appropriate electronic records system.

5.3 *Disposition* indicates what must be done when records reach the end of their designated retention period. All records in all formats covered under this policy are approved for destruction once they are no longer needed. Transitory records may be deleted, recycled or destroyed depending on the nature of their sensitivity and or security classification. See the Procedures for more information.

## TRANSITORY RECORDS PROCEDURES

### 1.0 Managing Transitory Records

Managing transitory records makes it easier for employees to file and locate key records because unnecessary information of no long-term value is disposed of routinely. Files are kept cleaner, and storage costs are kept down because room is regularly made for new records and only those records with lasting value are kept.

Like all records, transitory records can exist in any format (paper or electronic), and can be created and shared using a variety of technologies (e.g. email, social media, the Web).

Having a policy that authorizes the regular destruction of transitory records makes the government accountable by ensuring that records are destroyed routinely and in the ordinary course of business, not in reaction to any event or issue.

### 2.0 Identifying Transitory Records

The following table shows the five types with examples and exceptions associated with each:

Category of Transitory Records	Examples (can dispose of):	Exceptions (keep!):
<p><b>1. Temporary Information</b>  <i>Information required to complete a routine action, prepare an ongoing record, or received for informational purposes only. It has little value and can be destroyed once it has been acted upon and is not required to support the operations and accountability of the program department.</i></p>	<ul style="list-style-type: none"> <li>✓ telephone messages</li> <li>✓ voicemail messages</li> <li>✓ opened envelopes</li> <li>✓ global and "FYI" emails</li> <li>✓ calendars and day timers</li> <li>✓ informal notes</li> <li>✓ routing slips</li> </ul>	<ul style="list-style-type: none"> <li>✗ messages that provide evidence of a decision or action taken</li> <li>✗ notebooks, day timers, daybooks and journals when notes are used as a source for decision making, e.g. Directors' notebooks</li> </ul>
<p><b>2. Duplicate Documents</b>  <i>Copies of documents that do not contain added, changed or deleted content or significant annotations AND a master copy has been filed.</i></p>	<ul style="list-style-type: none"> <li>✓ photocopies</li> <li>✓ print-outs of electronic or microform documents</li> <li>✓ courtesy copies (cc's)</li> <li>✓ global email messages</li> </ul>	<p>No exceptions</p>

Category of Transitory Records	Examples (can dispose of):	Exceptions (keep!):
<p><b>3. Draft documents and working materials</b> <i>Information that has been used to create the final version of reports, correspondence, memoranda and other records.</i></p>	<ul style="list-style-type: none"> <li>✓ notes, including research notes</li> <li>✓ calculations, lists, outlines</li> <li>✓ draft versions, extracts, partial copies</li> <li>✓ editing and formatting notes</li> </ul> <p>ONLY BECOME TRANSITORY <b>AFTER</b> A FINAL PRODUCT IS PRODUCED AND FILED.</p>	<ul style="list-style-type: none"> <li>✗ Draft documents important to understand the development or importance of a final version (significant content has been added, changed, or deleted)</li> <li>✗ Drafts of legislative and policy decisions</li> <li>✗ Last draft copy where no final report has been produced</li> <li>✗ Scientific notes</li> <li>✗ Draft versions of government publications, posters, films, other communications materials</li> </ul>
<p><b>4. Publications</b> <i>Published material available elsewhere. May have been developed by or for the department or acquired from outside source.</i></p>	<ul style="list-style-type: none"> <li>✓ books</li> <li>✓ magazines</li> <li>✓ newspapers</li> <li>✓ brochures</li> <li>✓ journals</li> <li>✓ articles</li> <li>✓ internet research</li> <li>✓ newsletters</li> <li>✓ posters</li> <li>✓ software</li> <li>✓ software manuals</li> <li>✓ KDFN publications that were <b>not</b> created by your department, e.g. reference or display copies that are duplicates</li> </ul>	<ul style="list-style-type: none"> <li>✗ Publications created by KDFN – department who created them is responsible for maintaining the master record, along with Communications.</li> </ul>
<p><b>5. Advertising Materials</b> <i>Include solicited and unsolicited information received from individuals or organizations advertising their products and services.</i></p>	<ul style="list-style-type: none"> <li>✓ brochures</li> <li>✓ sales letters</li> <li>✓ catalogues</li> <li>✓ price lists</li> <li>✓ company profiles</li> <li>✓ announcements</li> </ul>	<ul style="list-style-type: none"> <li>✗ Advertising materials considered of significant interest to the unit or department can be filed with other records.</li> </ul>

## 2.2 Deciding if a Record is Transitory or Not

Transitory records:

- DO NOT document a decision, government activity or transaction
- DO NOT support the accountability of the department
- DO NOT support departmental operations or programs
- ARE NOT required to meet statutory (under law) or other legal obligations

*See the diagram on the last page for more guidance in deciding if a record is transitory or substantive.*

Examples of NON-transitory records include:

- documentation of work unit activities (work schedules, assignments, etc.)
- useful information that helps explain the history of a relationship, decision or project
- drafts or revisions with information about a decision or related approvals that is not available elsewhere (e.g. directions to change a proposal and recommend a different course of action)
- a final report with recommendations
- formal communication about official business
- policies and directives
- decision documents, instructions and advice
- meeting agendas and minutes
- documentation of a policy matter or how a case was managed
- documentation of business transactions
- documentation that provides evidence of a significant action (e.g. verification or approval to proceed)

## 3.0 Confidential Transitory Records

Transitory records are considered confidential if they contain any information that, if released, could harm the privacy of individuals, Kwanlin Dün First Nation as a government, its membership as a whole, or the commercial or financial interests of a third party. Confidential information must be protected from being shared with others using the following practices:

- Do not leave confidential information sitting out where it can be seen and read by passers-by and visitors. Put it face down or away in a file or drawer, or minimize your computer window.
- Lock desk or file cabinet drawers containing confidential information when you are not in your office.

- Lock your computer when you leave your desk (hit CTRL+ALT+DELETE on keyboard, or Windows key + L).
- Lock your office door when you are absent.
- When speaking on the phone about confidential issues, lower your voice and be aware if anyone is around you to overhear.
- Use a fax cover sheet with a confidentiality notice on it when needed.
- Remain at the photocopier if confidential information is being copied.
- DO NOT send confidential or personal information over email.
- Shred confidential information you no longer need, or deposit in a secure shredding (grey) bin.

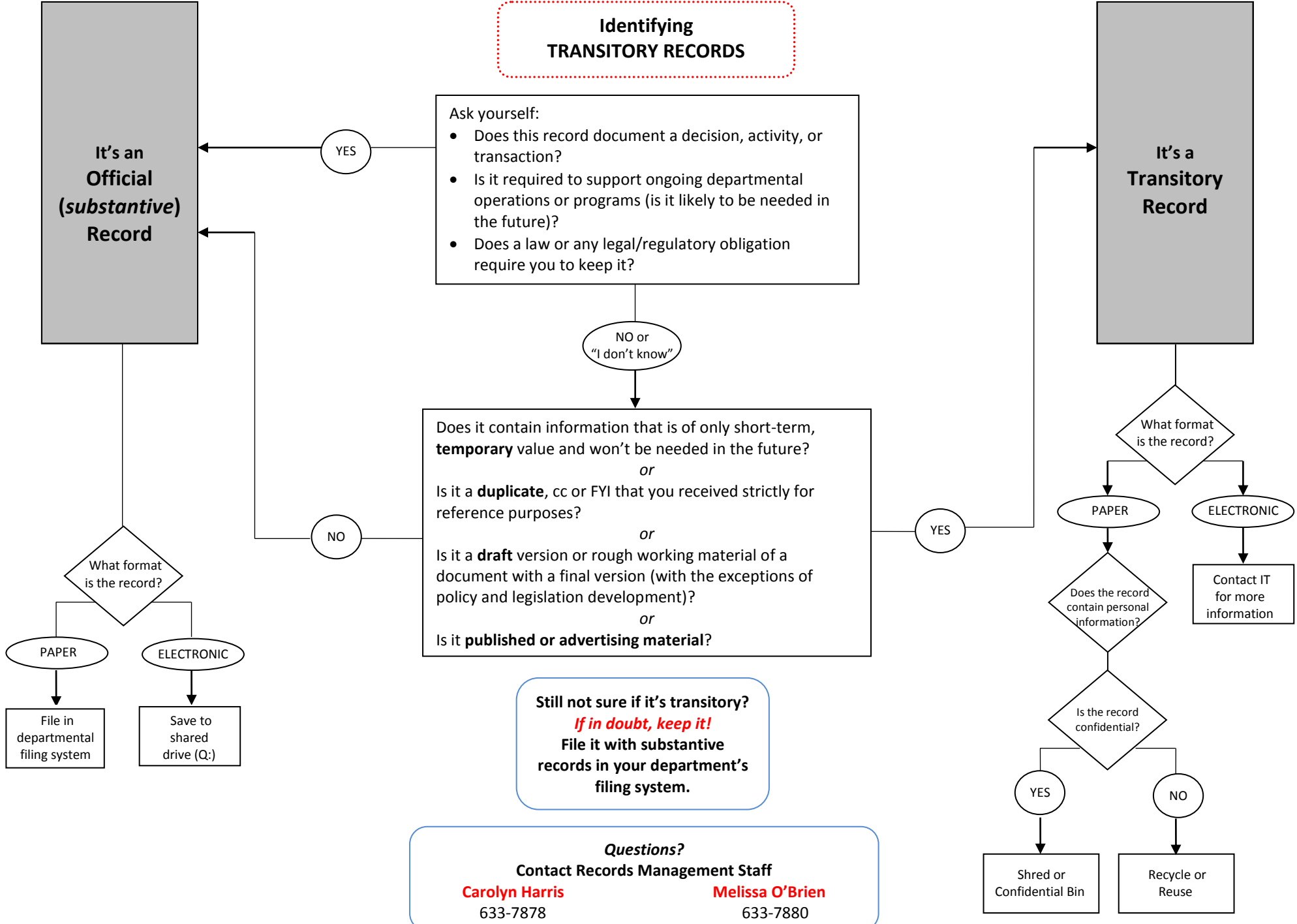
#### 4.0 Disposal of Transitory Records

The Transitory Records Policy authorizes all employees to dispose of transitory records as soon as they are no longer needed; destruction does not have to be approved or documented as with other records. The method of destruction depends on the format of the record and whether or not it is confidential.

<b>Paper, Non-Confidential Transitory Records:</b>	Destroy (recycle) or re-use, e.g. make into notepads.
<b>Electronic, Non-Confidential Transitory Records:</b>	<p>On shared drive: delete when no longer needed, or better yet, <b><i>do not create on the computer in the first place!</i></b></p> <p>On removable storage: Media like memory sticks, DVDs, CDs, etc., should never be used to store records.</p>
<b>Confidential Transitory Records:</b>	<p>Shred paper manually or place in a confidential bin.</p> <p>On shared drive: delete when no longer needed, or better yet, <b><i>do not create on the computer in the first place!</i></b></p> <p>On removable storage: Media like memory sticks, DVDs, CDs, etc., should never be used to store records.</p>



**Identifying  
TRANSITORY RECORDS**



**Still not sure if it's transitory?**  
*If in doubt, keep it!*  
**File it with substantive records in your department's filing system.**

**Questions?**  
**Contact Records Management Staff**  
**Carolyn Harris** 633-7878      **Melissa O'Brien** 633-7880