



Policy Name: Records Management Policy & Procedures	Policy Number: AP004
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Date of Last Review:	

The Edmonton Screen Industries Office (ESIO) supports, represents and advocates the interests of the screen industries in the City of Edmonton. Goals include developing a strong partnership between the Screen Industries, the City of Edmonton, the business community and the orders of government through a shared vision and long-term planning. The files, materials, all forms of film and data media are important assets of ESIO. Due to the nature of the business of the ESIO and the relationships we have within the Screen Industries, the ESIO will often have access to and carriage of materials from those we collaborate with and serve as clients.

1.0 Purpose:

From a very practical perspective, keeping good records can help the ESIO operate more efficiently. Good records management practices help to provide a trail of important business decisions and transactions and to identify and safeguard valuable, useful and legally required records, regardless of format or media. Records are necessary to manage and comply with mandated statutory requirements. The Records Retention Schedule works to prevent the unnecessary accumulation and premature destruction of records.

Not only does this policy serve to identify those records of the ESIO which have long term value, and which must be maintained, but it also defines how long records must be maintained, the final disposition of the records. Consistent application of the ESIO Records Retention Schedule and compliance with ESIO Records Management Policy & Procedures assures that information is retained only as long as it is needed to meet legal, fiscal, operational and historical requirements and to reduce the chance for inconsistent or reckless disposal of records.

From a legal perspective, keeping governing documents and minutes of Board/Committee meetings in good order is an absolute must. These minutes record all

important decisions and the rationale behind them. Good minutes demonstrate that directors have upheld their fiduciary duty.

2.0 Policy:

All Records should be managed in a systematic manner, in compliance with applicable laws and the policies of the ESIO. 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. 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. Records must be managed and disposed of in a manner appropriate to the sensitivity of the information contained in the Record. 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.

3.0 Regulations:

1. 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 ESIO creates, receives or maintains in connection with the conduct of the ESIO'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.

2. **Application.** This Policy applies to all departments within the ESIO, to all Records, and to all staff and Board/Committee Members who create, receive or maintain Records in the course of their duties for the ESIO, except archival Records retained by the ESIO for historic purposes. This Policy also applies to all service providers to the ESIO who create, receive or maintain Records on behalf of the ESIO. This Policy does not apply to Records that are subject to solicitor-client privilege.
3. **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 staff or Board Member's duties to the ESIO; 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.
4. **Responsibility for Retention.** Unless otherwise listed in the Records Retention Schedule and subject to Section 7 below, Records must be retained by the department or individual. In the situation of dissolution or wind up of the ESIO, all records will be transferred to legal council to retain for the required period.
5. **Retention of Internal Communications.** For internal communications within the ESIO where both the sender/creator and recipient are ESIO employees, the sender/creator is required to retain the Record.
6. **Print Records.** Records need not be retained in printed form but may be stored in electronic format, if that is appropriate and available for that particular record.
7. **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.
8. **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.
9. **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.
10. **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.

11. 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 the CEO, Finance Director or the designated senior officer responsible for record retention within the ESIO. Where the destruction has been carried out by third parties, written verification of such destruction should be obtained from the third party.
 - a. The ESIO records that contain personal information and sensitive information as outlined above must be destroyed in such a manner so that information cannot be reconstructed or retrieved. Paper documents must be shredded.
 - b. Electronic files must be permanently and thoroughly deleted from all online and offline storage media using existing digital shredding techniques to prevent data reconstruction. If detailed historical transactions are to be retained, all personal identifiable data (name, home address, home telephone number) must be destroyed.
12. Non-Destruction of Records. Legal requirements supersede any ESIO 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 ESIO has received a request for access to information contained in a Record, the Record must not be Destroyed without the written permission of the Legal Counsel of the ESIO.
13. Listing of Destroyed Records. 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
14. Records Retention Schedule. The senior staff responsible for privacy and the retention of Records shall establish a Records Retention Schedule in accordance with this Policy and is responsible for:
 - a. maintaining and publishing the Records Retention Schedule
 - b. reviewing the Records Retention Schedule periodically and updating it as required; and
 - c. retaining copies of all previous versions of the Records Retention Schedule and a Record of the period during which each was in effect.

Record Retention Schedule

The following chart provides some common examples of records and suggested retention periods. Every attempt has been made to give accurate information in this schedule.

Type of Record	Retention Period	Legal Reference
Information related to the business processes undertaken by the ESIO Board to carry its mandate, including relationships with government and the community. It includes the appointment of members, its responsibilities, activities and decisions. Includes bylaws and minutes.	Permanent	<i>Business Corporations Act (Alberta)</i>
Information related to Executive interaction with other bodies structured for specific tasks. Committees include but are not limited to: steering, sub-committees, work groups, task forces, Board meetings, etc. Records include minutes, agendas, records of decision, reports and terms of reference	Permanent	<i>Business Corporations Act (Alberta)</i>
Information related to the creation and final approval of contracts, agreements, memorandums of understanding, etc. including third party agreements.	11 years	Limitations Act (Alberta) s. 3
Reports and correspondence of incidents, complaints & complements. Includes investigation & reporting of safety incidents, information security breaches, physical security incidents, OH&S reports relating to incidents involving staff injury, concerns and comments.	11 years	<i>Limitations Act (Alberta) s 3,</i>
Information associated with insurance claims in response to reports of loss, theft, damage, repair estimates, investigations, short term and long-term disability benefit claims	11 years	<i>Limitations Act (Alberta) S. 3,</i>
Information related to communication plans and materials in consultation with stakeholders to achieve communication goals, the development, approval and distribution of delivering messages through various communication vehicles, e.g. websites, broadcast media, etc.	5 years	
Information related to the organization of events, tours, ceremonies and other public venues involving the organizations and/or business unit representation.	2 years Selective	
Information related to tracking and developing responses to informal information requests from stakeholders, other levels of government and interest groups.	5 years	

Type of Record	Retention Period	Legal Reference
Information related to the training and development of staff through in-services, programs of selection, assignments, self-development and programmed training. Includes Staff training and orientation, competency assessments.	5 years	
Information related to the acquisition & management of physical assets, such as buildings, land, major equipment, vehicles, telecommunications equipment etc. Includes summaries of transactions, copies of invoices and receipts and purchases journals, fixed asset inventories, depreciated assets lists, surplus equipment, and write offs. Records also include government and commercial licenses and permits for use and operation of equipment, buildings, and land	7 years	<i>Income Tax Act (Canada)</i> s230, 230.1 <i>Income Tax Regulation</i> s.5800 and Information Circular 78-10RC
Information related to the management of the request, proposal review, approval and implementation processes. Planning includes terms of reference, project plan and request for proposals; General Administration includes progress reports, correspondence and timeline; Financial includes budget or cost centers, invoices, insurance, leases and contracts; design development bid documents includes specifications, drawings, and addendums; Contract administration includes changes orders, permits, certificates of final completion and furniture and equipment. Renovation request, proposal review, approval and implementation processes.	11 years	<i>Limitations Act</i> s.3, <i>Canada Income Tax Act</i> s.230
Information resulting from the function of managing the entries made in the general ledger. Includes financial audits and audited financial statements.	Permanent	<i>Income Tax Act (Canada)</i> s230, 230.1 <i>Income Tax Regulation</i> s.5800 and Information Circular 78-10R3 Books and Records Retention and Destruction
Information related to banking activities including deposits, bank drafts, and bank statements. Also includes cancelled checks, check journals, and requisitions, information related to the reconciliation of accounts	7 years	<i>Canada Income Tax Act (230,230.4)</i> <i>Income Tax Regulation</i> 5800
Information related to the process of managing the efficient, effective flow and storage of both inbound and outbound materials, goods, services and related information. Includes mail and courier, transportation, distribution and tracking.	3 years	

Type of Record	Retention Period	Legal Reference
Information related to the business processes associated with the administration of individual employees, recruitment, workforce planning, worker's compensation and other functions not elsewhere classified. This may include other activities that support the management of human resources.	6 years	<i>Employment Standards Code (Alberta)</i> s.14 and 15 <i>Pension Plan Act</i> s.24

Date: Dec 11/19

Chair: 

CEO: 