

Record Keeping – Best Practice

Identify Records

- A record is any record of information however recorded, whether by electronic means, in print form, on film, or otherwise, and includes:
 - (a) correspondence, a memorandum, a book, a plan, a map, a drawing, a diagram, a pictorial or graphic work, a photograph, a film, a microfilm, a sound recording, a videotape, a machine-readable record, any other documentary material regardless of physical form or characteristics, and any copy thereof; and
 - (b) subject to the regulations, any record that is capable of being produced from a machine-readable record under the control of an institution by means of computer hardware and software or any other information storage equipment and technical expertise normally used by the institution. (s.2(1) *Freedom of Information and Protection of Privacy Act (RSO 1990)*)
- University records are those records within the university's custody or control. They include records relating to the university's operation and administration, and records containing information relating to individual faculty, staff and students. University records may be the subject of a request for access under the *Freedom of Information and Protection of Privacy Act (RSO 1990)*

Distinguish between University and Non-University Records

- Non-university records may include items such as research and study notes, teaching materials, publications and personal communications of individual faculty, staff and students.
 - **Identify non-university and personal records – mark your personal records as such**

Create Records with Access in Mind

- Create records with the expectation that they could be made accessible under FIPPA or in the course of a legal dispute.
 - **Omit unnecessary information. Collect and record only the information needed to accomplish a task or meet a requirement**
 - **Do not assume that if it is possible for access to be withheld to a group of records, that access will be withheld as a matter of routine**

- **Remember that most e-mail messages on university servers are university records; keep them brief and business-like. E-mail messages that document actions or decisions should be stored with access in mind**
- **Mark records containing information requiring protection as CONFIDENTIAL and treat accordingly. Although a CONFIDENTIAL identifier does not ensure a record will not be released, it does provide strong evidence for a decision to not release a document**
- **Clearly identify items (correspondence, minutes etc.,) if they contain advice or recommendations**
- **Keep minutes and other formal records of proceedings factual and record decisions taken or tasks resulting from the deliberations of a group or committee. Avoid recording gratuitous or unsubstantiated comments and opinions as part of university records. Avoid unnecessary detail**
- **State views, comments and opinions as objectively as possible. Individuals can view their personal information, which may include the views or opinions of another person about that individual**
- **If you make notes to document a conversation or discussion, avoid including unnecessary subjective comments or unneeded questions, or rewrite your notes to remove any unnecessary or subjective references**
- **A record that has on-going administrative, financial, research, legal or historical value should be filed at the time of its creation in a manner that facilitates retrieval by others**

Maintain Security

- Protect information against unauthorized access through 'need to know' access only, physical security measures and sound procedures that are appropriate to the sensitivity, volume and medium of the records
- Confidential records contain information that for one or more reasons should only be disclosed to specific people or groups. While a confidential marking does not mean that a record will not be disclosed as the result of an access request, it may assist in preventing such release
- Confidential records include:
 - recorded information about an identifiable individual (personal information) unless it is public information;
 - information which is subject to solicitor/client privilege;
 - information which was supplied in confidence, either explicitly or implicitly;
 - information relating to the business of the university or a third party and including (but not limited to) trade secrets and scientific, technical, commercial, financial or labour relations information, where disclosure could result in some harm to either the university or a third party.

- Ensure that records for which circulation should be limited are clearly marked *CONFIDENTIAL*
- Determine who should have access to a confidential record. Normally a university employee who needs the information to perform his/her duties would have access, e.g. a tenure and promotions committee member would have access to the committee's record of proceedings but circulation would be limited to committee members only and the material should be held in confidence. *Note on the record itself or in associated notes the persons or groups who should have access to the information*
- Use the *CONFIDENTIAL* designation with discretion. Do not mark most or all of your records in this way – doing so will undermine the argument for restricting access to such records
- An individual's personal information is to be used for the purpose for which it was collected or for a consistent purpose
- Ensure that confidential information is not inadvertently disclosed:
 - **Position your computer screen so that no unauthorised persons can read it**
 - **Close down the program or use password protection on your computer when you leave your desk**
 - **Turn off your computer when leaving your desk for a long period of time**
 - **Place paper copies of drafts and final versions in locked file cabinets when not working on them**
 - **Shred or otherwise dispose of drafts when they are no longer useful, and delete drafts from your computer**
 - **When traveling with confidential records, do not leave them unattended in vehicles, hotel or meeting rooms, Do not work with confidential records where others can see them**
 - **When faxing confidential records, include a fax transmittal page with a confidentiality statement. Verify that the number on the screen is accurate before proceeding with the transmission, and confirm receipt of the documents**
 - **Include a confidentiality statement on e-mail correspondence. A sample statement can be obtained from the University Secretariat**
- Ensure that confidential information is protected against unauthorised access. Store confidential records in a secure location such as a locked filing cabinet, locked record room or on a secure server
- Dispose of confidential information securely, and ensure that any personal information to be destroyed has been authorised for disposal. Do not place confidential material in recycling bins

Identify Transitory Records

- Distinguish university records with long term value from transitory records which are of short term value and have no continuing operational, informational, evidential or historical value
- As a general rule, destroy transitory records as soon as they have served their primary purpose
- Transitory records include:

Announcements and notices of a general nature

- notifications of meetings, special events, holidays, acceptances or regrets
- memos to all staff

Drafts

- preliminary drafts which do not reflect or record significant steps in the preparation of final document or record decisions
- working papers where the results have been written into an official document and which are not required to support it

- **Once the final version of a report or other record is prepared, earlier drafts and working materials usually should be destroyed. Exceptions include drafts which form part of negotiations, such as draft contracts and other agreements, or versions that show changes in policy or approach**

Convenience or duplicate copies

- 'cc' and 'FYI' copies
- 'snapshot' printouts or extracts from databases
- minutes and agenda received from other parts of the university or external groups which require no action
- copies of correspondence which is also elsewhere in the filing system

- **Do not retain these materials after task or operational need ends**

Messages – where the information has only immediate or short-term value

- business messages, for example, e-mails to schedule or confirm meetings
- personal messages

Superseded lists

- address lists, distribution lists, membership lists, etc.

Transmission documents

- letters, fax cover sheets, e-mail messages, routing slips, compliments slips etc., that accompany documents but do not add value

Superseded in-house publications

- administrative manuals, telephone directories which are obsolete or otherwise no longer useful
- published reports, newsletters or reference material received from other parts of the university, from vendors or external organizations where no action is required

Dispose of Transitory Records

- Discard transitory records regularly

- **Within the office file system it may be useful to file transitory materials separately from items which must be retained for a specified period of time**
- **Review transitory materials regularly and discard after operational need ends**
- **Clearly identify *draft* items and, where appropriate, discard once the final version of a document is prepared**
- ***Exercise judgment* regarding transitory records that may need to be kept, such as**
 - **drafts and working papers of legal documents that may need to be retained to document how the final agreement was reached**
 - **versions which show changes in policy or approach may have longer term value for archival purposes**
 - **budgets or policies may have future value in the unit responsible for their creation**
 - **a telephone message slip or transmission document may be kept as evidence of contact at a certain time and date**
 - **an envelope may be kept because of the postmark**
 - **a convenience or duplicate copy becomes a new record if it contains important handwritten or electronic notes and substantive information**
 - **periodic print-outs may constitute an important 'snapshot' record of a dynamic database**

USE DISCRETION!