PROVINCIAL
ARCHIVES OF
SASKATCHEWAN

Policy for Managing Records Created on Collaboration Platforms

Background

With the ever increasing push towards digitization and electronic working environments, communication and collaboration apps like Microsoft Teams and Webex provide us with convenient and effective spaces to conduct business. Collaboration apps and platforms include features that allow employees to send instant messages in chats, conduct video meetings, share files, and integrate other apps to create a collaborative digital workspace. One of the challenges that Provincial Government employees face is ensuring that public records created in these environments are managed effectively.

In collaborative, digital spaces, it is easy to overlook the fact that you may be creating public records that need to be captured and managed in accordance with *The Archives and Public Records Management Act (APRMA).*

A public record is defined as recorded information in any format related to the transaction of government business that is received or created by a government office in Saskatchewan. This means that even in chat and video based environments like MS Teams, Webex, etc., Government employees need to ensure that the information created in the course of their work related to decision making, policy and procedures, or operations and services is treated as a public record. For example, if your organization uses MS Teams to approve or finalize reports created by offsite staff or remote workers, these approvals are considered government records and have to be managed according to *APRMA*. It is important to follow internal records and information management (RIM) practices compliant with policies established by the Provincial Archives of Saskatchewan (PAS) and applicable legislation.

Purpose

The purpose of this policy is to specify the RIM requirements for all Government of Saskatchewan institutions that use collaboration platforms such as Microsoft Teams, Webex, etc.

Scope

This policy applies to all Government of Saskatchewan institutions and other government bodies subject to *The Archives and Public Records Management Act.*

Policy

As collaboration platforms are only tools for communication, they do not have the necessary controls to facilitate records management and therefore cannot be used as storage for public records. It is the responsibility of government institutions to transfer all public records that are created in online collaborative workspaces to the institution's official records keeping system and manage those records according to *APRMA*. Records captured in the records keeping system need to be classified with other related records in accordance with applicable records schedules and internal policies. This ensures that a complete record documenting government processes and services is retained in accordance with business and legal requirements.

Government institutions are also responsible for ensuring that transitory records are managed appropriately on collaboration platforms. Once the public records are captured from the platform, the remaining information is considered transitory, according to the *Guidelines for the Management of Transitory Records* and should be routinely destroyed.

Requirements

- *Privacy and Security* – Government institutions need to be able to apply adequate protective controls for the level of information being exchanged, recorded, etc. If possible, confidential or personal information should not be exchanged on collaboration platforms. If the exchange of this type of information is necessary, government institutions need to ensure that the platform offers sufficient security controls in order to protect the information and comply with privacy legislation.
    - Institutions should be aware of whether or not collaboration platforms store backup copies or recordings of records, as this may pose privacy and/or security risks.
    - For any meetings that may result in the exchange of confidential, personal or personal health information, institutions should consider alternative forms of communication to reduce the risk of this information being recorded or stored in such a way that it cannot be controlled by the institution.
    - For additional privacy considerations, see: ***Advisory from the Office of the Information and Privacy Commissioner of Saskatchewan on Pandemic and Virtual Meetings.***

- *Capture of records* – Any public records created within the platform, as well as the associated metadata, must be transferable to an institution's record keeping system so they can be maintained in accordance with *APRMA*.

- *Deletion of records* – Government institutions must have the capability to delete records from collaboration platforms. Government institutions must also be aware of the deletion policies and timelines followed by the collaboration site in order to make sure that all public records are transferred to the internal records keeping system of the institution before deletion procedures are enacted. If possible, institutions should choose collaboration platforms that can allow for the **complete**[1] deletion of records from the platform.

- *Internal policies and procedures* – Government institutions need to develop and implement internal procedures and practices for the use of collaboration platforms, and ensure that employees understand their responsibilities. Provisions for the identification and capture of public records should be included in these procedures in order to remain compliant with applicable legislative requirements. They should also include information such as:
    - What features of the platform should be used for what purposes
        - For example, you may choose to state in your procedures that user-to-user or individual chats should only be used for transitory communications.
    - When and how public records should be captured
        - It is recommended that all public records be captured in institution's official records keeping system as soon as possible after the collaborative session, meeting, discussion, etc. IT staff should be consulted when developing user procedures for records capture and to provide ongoing user support.
    - Where the public records are located in the organization's records keeping system and who has access
    - Who is responsible for the capture of public records, and to whom this responsibility is transferred if the original designate leaves the project or organization. Determining who is responsible for capturing public records may depend on who the participants are and nature of the collaboration. For example:
        - If all participants are from within a single government institution, you may choose to designate the owner of the workspace to capture public records.
        - If a workspace involves collaboration between several different organizations, then each participant may need to be responsible for capturing related records in their institution's records keeping system.
        - If you own or if you are part of a workspace that involves communication with external clients (e.g. individuals), then you should be responsible for capturing public records for your institution.
    - How long transitory records are retained in collaboration platforms
        - It is recommended that transitory information be deleted from collaboration platforms immediately after the collaborative session, meeting, discussion, etc.

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[1] Complete deletion means that the records cannot be recovered or reconstituted in any way. All backup copies created (and potentially stored in the cloud) should be deleted at the same time as the primary record.

is completed and any public records have been captured in the internal records keeping system. Note that transitory information remaining in Teams or other collaborative platforms is subject to FOI requests and legal holds!

Authority

The Provincial Archivist of Saskatchewan has issued this policy in accordance with s.18(2)(e) of *The Archives and Public Records Management Act.*

Accountability

Heads of Government institutions are responsible for compliance with this policy.

Links

Guidelines for the Management of Transitory Records:
https://www.saskarchives.com/sites/default/files/pdf/transitory_rec_guide_fin.pdf

Advisory from the Office of the Information and Privacy Commissioner of Saskatchewan on Pandemic and Virtual Meetings:
https://oipc.sk.ca/advisory-from-the-office-of-the-information-and-privacy-commissioner-of-saskatchewan-on-pandemic-and-virtual-meetings/