PROVINCIAL ARCHIVES OF SASKATCHEWAN

Policies and Procedures for a Records Management Program

Introduction

This document outlines the policies and procedures government institutions may require in order to build a records management program that is compliant with *The Archives and Public Records Management Act*. The list has been divided into two parts. The first part contains core policies and procedures that will form the basis of a records management program. The second part lists further policies and procedures that institutions may find useful for their records management program to run smoothly or that may be needed depending on circumstances within the institution. Please note that this list may not be exhaustive and that staff responsible for records management may identify additional policies and procedures required to meet your institution's needs. If so, your institution's records management staff should not hesitate to develop and implement them. Additionally, institutions are not required to divide their records management policies and procedure as outlined below; each institution may combine policies and procedures as it sees fit.

Further information on many of the subjects discussed the list below can be found on the Provincial Archives of Saskatchewan's website at http://saskarchives.com/services-government/record-management-policy-and-guidelines.

Core Policies/Procedures

1) **Records Retention Schedule** – A retention schedule is a fundamental policy that sets out the records that are created or received by an institution as it conducts its business. Retention schedules are required by *The Archives and Public Records Management Act* for managing government records. A schedule's classification system organizes records into logical groupings called record series, based on business functions. This allows all employees to file records consistently. Attached to each record series is a retention period that advises users how long the records classified within that series must be kept by the institution. The Provincial Archives strongly recommends that the creation of a records retention schedule be an institution's starting point when developing a records management program.

2) **Over-Arching Records Management Policy** – This policy defines the institution's records management responsibilities, and explains the purpose and objectives of the institution's records management program. It may also direct people to additional records management policies/procedures for information on specific topics. For an example of a basic records management policy, please refer to the Archives *Records Management Policy Model.*

3) **Records Management Accountability Structure** – The accountability structure outlines the roles and responsibilities that employees at all levels of the institution have in regard to records management. This may be a stand-alone document or may be included as part of the institution's Over-Arching Records Management Policy. An example of an accountability structure can be found in the Archives' *Records Management Policy Model.*

4) **Filing Policies/Procedures** – Filing policies and procedures are those which address the day-to-day management of the institution's records. These include naming conventions, which set out a standard

approach for naming documents to promote consistency across the institution (please refer to the Archives' *Naming Conventions* document), year-end file closure procedures that direct employees to move records that are no longer required from the active filing system into storage where they can wait out their retention periods, procedures for recalling inactive records from storage if a need for them arises, etc. Many filing procedures rely on the institution first implementing approved retention schedules for their records.

5) **Transitory Records Policy and Procedures** – These documents help employees understand the difference between transitory records and government records that are classified and retained as per the applicable retention schedule, so that transitory records can be correctly identified and destroyed when no longer required. An institution's transitory records policy must be consistent with the Archives' *Transitory Records Guidelines*, which outline the various types of transitory records collected/produced by government institutions. The policy and procedures should also address the disposal of transitory records. Employees should be advised of how to appropriately dispose of transitory records that contain personal, confidential or sensitive information.

6) **Internal Disposal Policy and Procedures** – While government institutions are required to follow the disposal process established by the Provincial Archives, it will be necessary to develop an internal disposal policy and procedures to ensure that the institution's records are disposed of regularly and in accordance with *The Archives and Public Records Management Act*. The policy and procedures should outline roles and responsibilities in regard to disposal of government records, including the position(s) in the institution responsible to regularly review inventories of records to determine which are eligible for disposal and prepare disposal requests, any position(s) (in addition to the institution's Designated Records Officer) that are required to sign off on requests for disposal before they are submitted to the PAS, and the position(s) responsible for ensuring that records are not subject to FOI requests or legal holds prior to disposal.
The policy and procedures should also address destruction of records to make certain that all records that contain personal, confidential or sensitive information are destroyed in a secure environment and in a manner that ensures they cannot be reconstructed. The destruction policies and procedures should identify the position(s) responsible for coordinating the destruction process internally or externally. The policy should make clear that all documentation of the disposal of official records, including destruction certificates, must be retained by the institution in accordance with an approved records retention schedule. Additionally, it may be useful for the policy/procedures to specify an office or a position within the institution that is responsible for ensuring that the disposal documentation is retained.

7) **Records Security Policy and Procedures** – An institution's records security policy should establish that the institution and its employees have a responsibility to safeguard records in all formats from unauthorized access, alteration and destruction. Security is especially important in cases where records contain personal, confidential or sensitive information. However, institutions should also keep in mind that even when records do not contain any such information, appropriate security measures must still be in place in order to ensure the authenticity and integrity of the records. Procedures should establish the specific measures that will be taken to protect the institution's records and explain the steps that employees must follow in order to meet their responsibilities.

8) **Electronic Records and Email Management Policies and Procedures** – These policies and procedures should make clear to employees that electronic records and email that meet the definition of a

government record must be managed according to the same requirements as other government records. The policy should identify the method or methods that will be used by the institution to manage electronic records and email, and procedures should explain how the method(s) chosen to manage these records can be carried out. All official government records must be maintained in such a way that they are legible, useable and accessible for the length of the retention period specified in an applicable approved retention schedule. In the case of electronic records, this means that they may need to be migrated to prevent them becoming inaccessible due to format obsolescence. The institution's electronic records management policies should ensure that a position within the institution is assigned the responsibility of monitoring the institution's electronic records for format obsolescence and should include a strategy for migrating electronic records when necessary. Information on the management of electronic records and email can be found in the Archives' *Electronic Records Guidelines* and *Email Management Guidelines*.

9) **Vital Records and Disaster Recovery Plan** – Vital Records are those records which are essential to the operations and/or survival of your institution, and that would be needed immediately after a disaster in order to get the institution up and running again. Your institution should identify its vital records, and develop a plan that outlines how best to protect them so that in the event of a disaster the loss of vital records is minimized.

Additional Policies/Procedures

1) **Text Messaging Policy and Procedures** – If employees in your institution use text messaging to conduct government business (for example, to communicate with clients or give direction to subordinates), these messages meet the definition of a government record and must be managed as such. Your text messaging policy should make certain that your employees understand that texts are government records. Because capturing texts as records can be a challenge and because the security of the devices used to text can be a concern, the policy should outline the circumstances in which employees may use text messaging to conduct government business and should specify if there are any types of information (i.e. personal information) that should not be communicated through text messaging. Procedures should explain how employees are expected to capture text messages to the institution's record keeping system. Policies and procedures should also establish appropriate security measures for devices used by government employees and make sure employees understand their responsibilities in this regard.

2) **Social Media Policy and Procedures** – If your institution has social media accounts, it should have a policy that establishes that when information posted on or received on those accounts meets the definition of a government record the institution is responsible for capturing and retaining the information and managing it according to the same standards that apply to other government records. Procedures explaining how to capture records from social media accounts will also be necessary. For information regarding the management of records posted on or generated by social media accounts, please see the Archives' *Social Media Policy* and *Social Media Guidelines*.

3) **Legal Hold Procedures** – Government institutions may become involved in litigation, as well as government or legal investigations. When this happens, any records that are reasonably expected to be required for the litigation or investigation cannot be disposed of, even if they have met their required

retention period. A legal hold procedure should set out how employees will be notified that records have been placed under a legal hold, how required records will be collected and how employees will be notified when a legal hold is lifted and the regular disposal process may proceed.

4) **Departing Employee Procedures** – Employees frequently keep government records in their email accounts, on P drives, or in their offices. Procedures for an employee's departure should instruct employees that any government records that have not already been classified and filed in the institution's record keeping system must be transferred there prior to the employee's departure, so that valuable information is not lost. In the event of unplanned departures, procedures should assign responsibility for ensuring information is transferred to the record keeping system to an appropriate individual (for example, the employee's immediate supervisor).

5) **Imaging and Source Records Disposal Policy and Procedures** – Government institutions may wish to convert paper records to an electronic format or microfilm and designate the newly converted records to be the institution's official records. When an institution decides to undertake such a project, policies and procedures must be in place to maintain and prove the authenticity and integrity of the converted records for business decision making purposes and to ensure their legal admissibility in case the converted records are presented as evidence in legal proceedings. For more information concerning imaging and the disposal of source records, refer to the Archives' *Imaging and Source Records Disposal Guidelines*.

6) **Cloud Computing** – Government institutions must ensure that records management concerns are addressed when engaging cloud computing services. Those responsible for records management within the institution should prepare a document that establishes criteria that must be met by cloud computing services in order to satisfy records management requirements. For further information, please refer to the Archives' *Cloud Computing and Records Management.*

7) **Transferring Custody of Records** – Government reorganizations mean that responsibilities and programs may be transferred from one institution to another. In these situations, custody of the records related to the responsibility or program is typically transferred to the institution now in charge of it. When reorganization occurs the institutions involved should sign a transfer agreement establishing which institution is the owner of the records. Based on this agreement, procedures for the transfer of records between the institutions can be developed. For more information, please consult the Archives *Transfer of Custody Guidelines*.