

Records Management Policy

Effective Date:

This Policy takes effect on July 15, 2013

Purpose

The purpose of this policy is to achieve efficient and effective management of CMHC information with business value, herein referred to as “records” (refer to definitions), to support program and service delivery; foster informed decision making; facilitate accountability, transparency and collaboration; and preserve and ensure access to records; and ensure compliance with legislative, legal, operational, fiscal and archival requirements.

Policy Sponsor

This Policy is issued by the Sector Head responsible for Records Management.

Policy Requirements

In accordance with legislative, legal, operational, fiscal and archival requirements CMHC will ensure that policies and procedures are in place so that all records are:

- Created/collected to document activities and decisions;
- Declared into the authorized corporate records repository or approved off-site storage facilities, and in accordance with approved metadata requirements;
- Organized in accordance with corporate file plans (new - will be effective when Records, Document and Information Management System (RDIMS/GCDocs) is implemented);
- Protected from unauthorized access, disclosure, alteration, deletion, disposition and loss;
- Preserved to ensure access, reliability, completeness, authenticity and usability for as long as required;
- Retained in accordance with corporate retention schedules, and respecting Legal Hold and Access to Information Orders; and
- Disposed of, or ownership transferred, in accordance with corporate disposition schedules regardless of format, repository or business system.

Electronic systems will be the preferred means of creating, using, and managing records throughout their life-cycle where possible.

Application and Scope

This policy applies to all records created, received and maintained by CMHC employees in the conduct of CMHC business, regardless of format, where they are created, or where they are stored.

Applicable Legislation

CMHC is subject to certain legislation and therefore must conduct its records management operations in a prescribed manner in order to adhere to this legislation.

Refer to supporting Instrument 2 “Government of Canada Information Management Related Legislation, Policies and Directives”.

Definitions

Refer to supporting Instrument 1 “Definitions”.

Roles and Responsibilities

The following outlines the roles and responsibilities in supporting the effective management of records.

All CMHC Employees are responsible for:

- ✓ Ensuring that they are aware of and understand their responsibilities, and attend training to apply effective records management in day-to-day operations;
- ✓ Ensuring that business and administrative processes are in adherence to records management policy and procedures, and that records are:
 - Created/collected to document activities and decisions;
 - Declared into the official corporate records repository or approved off-site storage facilities, and in accordance with approved metadata requirements;
 - Organized in accordance with corporate file plans (new - will be effective when RDIMS/GCDOcs is implemented);
 - Protected from unauthorized access, disclosure, alteration, deletion, disposition and loss;
 - Preserved to ensure access, reliability, completeness, authenticity and usability for as long as required;
 - Retained in accordance with corporate retention schedules, and respecting Legal Hold and Access to Information Orders; and
 - Disposed of, or ownership transferred, in accordance with corporate disposition schedules regardless of format, repository or business system.

In addition to the above:

President and CEO, is responsible for:

- ✓ Promoting a culture that values records and its effective management; and
- ✓ Approving substantive changes to records management policy.

Sector Head responsible for Records Management is responsible for:

- ✓ Allocating resources to support records management programs;
- ✓ Representing CMHC or providing a designate as required on Government of Canada information management committees, forums and activities;
- ✓ Recommending to the President and CEO for approval, any substantive changes or revisions to the records management policy;
- ✓ Recommending to the President and CEO the establishment of systems or processes necessary to carry out an effective, efficient, and successful records management program; and

- ✓ Reporting records management requirements, issues and concerns to the President and CEO.

Director, Administrative Services is responsible for:

- ✓ Recommending to the Sector Head responsible for Records Management the establishment of systems or processes necessary to carry out an effective, efficient, and successful records management program;
- ✓ Allocating resources to support records management programs;
- ✓ Recommending the creation of new and changes to the existing policy and procedures governing the creation, use, storage, protection, retention, and disposition of all CMHC records to the Sector Head responsible for Records Management;
- ✓ Chairing the Records Retention and Disposition Committee; and
- ✓ Communicating records management policy, support instruments and procedures to CMHC staff.

Corporate Records Management Group is responsible for:

- ✓ Providing strategic advice and monitoring of the records management program;
- ✓ Maintaining, revising, and managing the records management policy, support instruments and procedures;
- ✓ Recommending the creation of new and changes to the existing Records Management policy and procedures to the Director, Administrative Services;
- ✓ Collaborating with Business Lines in the development, maintenance and implementation of a corporate file plan;
- ✓ Collaborating with Business Lines in the development, maintenance and implementation of corporate retention and disposition schedules for recommendation to the Records Retention and Disposition Committee;
- ✓ Recommending material for disposition to the Records Retention and Disposition Committee and Business Lines;
- ✓ Approving and managing the disposition and archival transfer of records;
- ✓ Managing the outsourced arrangements for off-site records storage and retrieval;
- ✓ Developing, in partnership with Information Technology Division, the requirements for systems, tools or processes necessary to carry out an effective, efficient, and successful records management program;
- ✓ Coordinating the implementation of systems, tools or processes necessary to carry out an effective, efficient, and successful records management program;
- ✓ Developing and delivering records management training and awareness across the corporation; and
- ✓ Partnering with the Corporate Historian to ensure CMHC historical/archival records are preserved and made accessible as appropriate.

Director, Information Technology Division and Chief Information Officer is responsible for:

- ✓ Ensuring that records management policy requirements are inherent in the design, specifications, development and implementation of all corporate systems and applications;
- ✓ Developing, in partnership with Corporate Records Management, the requirements for and implementation of systems, tools or processes necessary to carry out an effective, efficient, and successful records management program; and

- ✓ Develop preservation, migration and destruction strategies for records and systems to support records management policy requirements.

General Counsel and Corporate Secretary is responsible for:

- ✓ The maintenance and preservation of CMHC official governance records so that they are safeguarded and accessible as necessary (CMHC By-Law No.44);
- ✓ Partnering with Corporate Records to develop and implement a process to identify corporation records and maintain a corporate inventory that may be of potential historical value to CMHC, including CMHC historical artifacts (RD 88:51 recommended the Vice-President, Public Affairs and Corporate Secretary be designated as the Corporate Historian);
- ✓ The receipt, care and custody of Cabinet Documents, Records of Decisions, etc., within the Corporation and for administering the processes by which access is provided and for internal communication of Records of Decision, etc.(RD 80:19);
- ✓ Retaining a copy of Treasury Board submissions, and the resulting decision letter;
- ✓ Retaining a copy of each submission for Order-In-Council and the decision thereon;
- ✓ Providing internal and external Access to Information and Privacy services; and
- ✓ Ownership and maintenance of the Security of Information Classification Guide.

Audit and Evaluation Services are responsible for:

- ✓ Periodically reviewing governance, risk management and controls, policy, processes and systems in place to manage records.

Vice-Presidents, General Managers and Executive Directors are responsible for:

- ✓ Ownership of all corporate records for their functional responsibility regardless of format, repository or business system;
- ✓ Appointing a Records Management representative to work with Corporate Records to champion good records management practices and coordinate records initiatives for their functional responsibility, leveraging Sector representatives for common initiatives i.e, Access To Information Representatives; and
- ✓ Reporting records management requirements, issues and concerns to the Sector Head responsible for Records in a timely manner.

Directors/Managers are responsible for:

- ✓ Management of all corporate records for their functional responsibility regardless of format, repository or business system as outlined under employee responsibilities;
- ✓ Ensuring that employees, business and administrative processes are in compliance to records management policy and procedures;
- ✓ Ensuring that their employees understand their responsibilities, and attend training provided by Corporate Records Management to apply effective records management practices into day-to-day operations;
- ✓ Planning for the disposition of records within their area of responsibility in accordance with approved disposition schedules, including the funding of disposition actions;
- ✓ Ensuring records management requirements are included in the contractual terms and conditions for contractors and others engaged in work for or on behalf of CMHC; and
- ✓ Reporting records management requirements, issues and concerns to their superiors in a timely manner including changes to the corporate file plan.

Records Retention and Disposition Committee (RRDC) is responsible for:

- ✓ Recommending to the Sector Head responsible for Records Management for approval, records retention and disposition schedules and disposition actions.

Reporting

Sector Head Responsible for Records Management will report records management requirements, issues and concerns to the President and CEO.

Vice-Presidents, General Managers and Executive Directors are to report records management requirements, issues and concerns to the Sector Head responsible for Records Management.

Sector Head Responsible for Records Management will report annually to Management Committee on:

- Records Management Compliance Statements completions and statistics by Sector;
- Records management requirements, issues and concerns;
- Any substantive changes or revisions to this policy and support instruments;
- Updates on the implementation of the RDIMS technology that may include statistics, challenges and next steps; and
- Recommendations that may include the establishment of systems or processes necessary to carry out an effective, efficient, and successful records management program.

Policy Changes and Revisions

Any substantive changes or revisions to this policy must be reviewed by the Sector Head responsible for Records Management for approval by the President and CEO.

The Records Management Policy and support instruments will be reviewed at a minimum every two years to ensure that they remain relevant and appropriate.

Inquiries

Inquiries can be directed to Carol Wells, Manager, Records Management.

Related Policies, Procedures and References

CMHC Code of Conduct
IT Data Storage and Safeguarding Policy
IT Security Policy and Standards
Email Usage Policy
Security Policy
Legal Hold Procedures

Business Continuity Plan
Access to Information Guide
Security of Information Classification Guide

INSTRUMENT 1 - Definitions

AUTHENTICITY- A record that can be proven: a) to be what it purports to be; b) to have been created or sent by the person purported to have created or sent it, and c) to have been created or sent at the time purported. *(Source: ISO 15489 International Records Management Standard)*

CORPORATE FILE PLAN: The framework that provides the rules and definitions used to organize, store and retrieve business information. Its primary purpose is to facilitate retrieval and disposition.

DECLARED: This “action” either through a manual or automated process renders the record uneditable and undeletable.

DISPOSITION SCHEDULE: A records retention and disposition schedule that provides an approved length of time that records are to be retained, and their associated disposition process at the end of their lifecycle in accordance with operational business needs, legal, and / or regulatory requirements.

ESSENTIAL RECORDS: A record essential to continuing or re-establishing critical institutional functions. *(Source: Treasury Board Policy on Information)*

INFORMATION MANAGEMENT – A discipline that directs and supports effective and efficient management of information in an organization, from planning and systems development to disposal or long- term preservation. *(Source: Treasury Board Policy on Information)*

INFORMATION LIFE-CYCLE - The life cycle of information management encompasses the following: planning; the collection, creation, receipt, and capture of information; its organization, use and dissemination; its maintenance, protection and preservation; its disposition; and evaluation. *(Source: TBS Directive on Recordkeeping)*

INFORMATION RESOURCES OF BUSINESS VALUE- Published and unpublished materials, regardless of medium or form, that are created or acquired because they enable and document decision-making in support of programs, services and ongoing operations, and support departmental reporting, performance and accountability requirements. *(Source: TBS Directive on Recordkeeping)*

INTEGRITY - The integrity of a record refers to its being complete and unaltered. It is necessary that a record be protected against unauthorized alteration. *(Source: ISO 15489 International Records Management Standard)*

RECORD – “Records” are information created, received, and maintained by an organization or person for business purposes, legal obligations, or both, regardless of medium or form. *(Source Treasury Board: Policy on Information)*

RECORDKEEPING – A framework of accountability and stewardship in which records are created, captured, and managed as a vital business asset and knowledge resource to support effective decision making and achieve results for Canadians. . *(Source Treasury Board: Policy on Information)*

RELIABILITY- A reliable record is one whose contents can be trusted as a full and accurate representation of the transactions, activities or facts to which they attest and can be depended upon in the course of subsequent transactions or activities. Records should be created at the time of the transaction or incident to which they relate, or soon afterwards, by individuals who have direct knowledge of the facts or by instruments routinely used within the business to conduct the transaction. *(Source: ISO 15489 International Records Management Standard)*

RETENTION and DISPOSITION SCHEDULE: A records retention and disposition schedule provides an approved length of time and format(s) in which records are to be retained, and their associated disposition process at the end of their lifecycle in accordance with operational business needs, legal, and / or regulatory requirements.

TRANSITORY RECORD: Those records required only for a limited time to ensure the completion of routine action or the preparation of a subsequent record. *(Source: CAN/CGSB 72.34.2005 – Electronic Records as Admissible Evidence and Canada Evidence Act)*

USABILITY - A useable record is one that can be located, retrieved, presented and interpreted. It should be capable of subsequent presentation as directly connected to the business activity or transaction that produced it. *(Source: ISO 15489 International Records Management Standard)*

INSTRUMENT 2 - Government of Canada Information Management Related Legislation, Policies and Directives

	Description / Purpose
Access to Information Act	The Access to Information Act provides a right of access to information in records held by federal government institutions in accordance with the principles that government information should be available to the public, that necessary exceptions to the right of access should be limited and specific and that decisions on the disclosure of government information should be reviewed independently of government
Canada Evidence Act	The purpose of this legislation is to establish rules of evidence for proceedings in court before administrative tribunals over which Parliament has legislative authority. The Common Law establishes additional rules with respect to the admissibility of documentary evidence in court and tribunal proceedings.
Copyright Act	The Copyright Act establishes a framework for the protection of rights in works, including documents. Copyright, in relation to a work, means the right to produce or reproduce the work or any substantial part thereof in any material form whatsoever, to perform the work or any substantial part thereof in public or, if the work is unpublished, to publish the work or any substantial part thereof.
Federal Accountability Act	The Federal Accountability Act provides for conflict of interest rules, restrictions on election financing and other measures respecting administrative transparency, oversight and accountability. In many of these measures, such as procurement and financial practices, sound records management practices are instrumental in meeting the obligations under the Act.
Income Tax Act	Canadian federal income taxes, both personal and corporate are levied under the provisions of the Income Tax Act
Library and Archives of Canada Act	The Library and Archives of Canada Act states that (a) the documentary heritage of Canada be preserved for the benefit of present and future generations; (b) Canada be served by an institution that is a source of enduring knowledge accessible to all, contributing to the cultural, social and economic advancement of Canada as a free and democratic society; (c) that institution facilitate in Canada cooperation among the communities involved in the acquisition, preservation and diffusion of knowledge; and (d) that institution serve as the continuing memory of the government of Canada and its institutions.
Personal Information Protection and Electronic Documents Act	The Personal Information Protection and Electronic Documents Act govern the collection, use and disclosure of personal information by private entities, and provides for the transmission of such information by electronic means.
Privacy Act	The Privacy Act governs the collection, use and disclosure of personal information by government institutions and provides individuals with a right of access to personal information about themselves that is held by those institutions, and is applicable to CMHC.
Privacy Regulations	The Privacy Regulations under the Privacy Act contain provisions regarding the retention of personal information.
Security of Information Act	This is an Act respecting the security of government information and governs the disclosure of certain types of sensitive information.

Relevant Federal Government Policy and Directives	
Policy on Information Management	The objective of this policy is to achieve efficient and effective information management to support program and service delivery; foster informed decision making; facilitate accountability, transparency, and collaboration; and preserve and ensure access to information and records for the benefit of present and future generations.
Recordkeeping Directive	This directive applies to Government of Canada departments as defined in section 2 of the Financial Administration Act, unless excluded by specific acts, regulations, or Orders in Council. It complements the Policy on Information Management by identifying the roles and responsibilities of all departmental employees in supporting the deputy head in the effective management of information in their department.
Directive on IM Roles and Responsibilities	This directive applies to Government of Canada departments as defined in section 2 of the Financial Administration Act, unless excluded by specific acts, regulations, or Orders in Council. It complements the Policy on Information Management by identifying the roles and responsibilities of all departmental employees in supporting the deputy head in the effective management of information in their department.