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Record Retention and Disposition Policy

Purpose & Objectives

The overall purpose and objective of a record retention system is to ensure that all University records are managed in conformance with acceptable Information and Document Management practices. A record retention system includes the identification, classification and retrieval, storage and protection, receipt and transmission, retention, and disposal or archival preservation of the recorded information. Ideally, a record retention system will ensure records are maintained throughout their life cycle according to accepted standards; are available for decision-making; are protected from unauthorized loss and/or release; and are either stored for long-term or historical purposes or disposed of only when all of the University's legal and operational obligations have been met.

To summarize, a record retention system ensures that:

1. Documents are maintained according to their legal and business requirements
2. Storage of records that are not active is done in a cost effective and organized manner
3. Records that have historical importance to the University are preserved
4. Documents are promptly and securely disposed of when they are no longer needed

Definitions

- Record: any information contained in any physical medium which is capable of preserving such information and includes any information contained in the original and in any copy of correspondence, memoranda, forms, directives, reports, drawings, diagrams, cartographic and architectural items, pictorial and graphic works, photographs, films, microforms, sound recordings, videotapes, videodisks, and video cassettes, punched, magnetic and other cards, paper and magnetic tapes, magnetic disks and drums, holographs, working papers, and any other documentary material or electro-magnetic medium - including electronic mail, regardless of physical form and characteristics.
- Electronic files: Any electronic record stored either on a personal computer, central computing facility or electronic device. Online storage is usually considered to be records that are located on an active disk or memory device. Offline storage can be any storage medium such as diskette, tape, CD, DVD, etc or a remote storage facility.
- Active Record: A paper or electronic record that is usually less than two years old and to which reference is sufficiently frequent that it must be held in close proximity for operational purposes
- Administrative Record: A paper or electronic record which reflects the internal administrative functions of the University such as realty; procurement; finance; human

- resources; general administration; and information management.
- **Archival Record:** A paper or electronic record that is of sufficient historical, legal, fiscal or pedagogical importance that it requires long-term preservation and storage with controlled access. Record Retention and Disposition Policy 1
 - **University Records Management Coordinator:** (hereafter the “Records Coordinator”) means the person(s) given the responsibility for maintaining a records retention program and coordinating the storage or retrieval of dormant and archival records in a manner consistent with University policy and archival methodology standards
 - **Dormant Record:** A record that is usually more than two years old and to which access is neither frequent nor urgent enough to warrant maintenance in relatively expensive office space.
 - **Lifecycle of a Record:** The span of time from the creation of the record through to the disposition of the record, whether by disposition or preservation within an archival facility.
 - **Office of Primary Interest (OPI):** The office or department that has the main responsibility for a subject area and any related documents. The OPI is accountable for ensuring that its records are maintained according to this Policy. All other areas receiving a record either as a convenience copy or transitory record are not required to maintain the record for the same period of time as the OPI. An example could be the minutes of a committee. The department having responsibility for the committee must ensure that those records are properly protected. All others are not required to do so, and their copies are considered records of convenience.

Scope

All records, whether they be electronic files, paper, email, voice recordings, written notes, etc., that are created in support of the governance and operations of the University of Guelph are to be managed in conformance with this policy. This does not include intellectual creations of faculty, staff and students as outlined in the Office of Research Intellectual Properties Policies and any related agreements or policies.

1. All University records produced by employees in the normal course of operations belong to the University.
2. Staff leaving the University of Guelph or relinquishing their position must leave all University records.
3. Each functional unit of the University of Guelph must create and maintain a Retention and Disposal Schedule for all records for which they are the OPI. Copies of these schedules must be shared and maintained by the Records Coordinator and reviewed at least annually
4. The Retention and Disposition Schedule developed by any University functional unit shall be in accordance with any relevant provincial or federal statutes, contractual agreements and any other standards that are applicable.
5. Disposition of University records must ensure that no sensitive information is exposed.
6. Disposition of any centrally stored dormant records will take place automatically according to their disposal status unless the OPI notifies the Records Coordinator of an exception in advance.
7. Any institutional documents that are to be classified as ‘archival’ must be approved by the Records Coordinator.

Retention and Disposition Schedules

The retention and disposition schedule are determined based on the needs for each functional unit within the University of Guelph. Each unit, such as Human Resources, Office of Research, Physical Resources, etc., will determine the sub-categories for records for which they are responsible, making them the OPI for that record. Each sub-category will have a schedule that describes the disposition of the record, based on the functional unit's business and legal needs. In some cases, all the unit's documents may be handled in the same manner so that only one category is needed.

Determining the disposition will establish if the records will be disposed, archived or treated with some special consideration. A records retention and disposition schedule includes:

- period of time records are considered active and kept on a computer or in office space
- point at which records become semi-active (dormant) and are transferred to storage or offline media
- total period of time the records are maintained in storage
- disposition of records or permanent preservation.

Retention Periods

The retention periods indicated in these schedules are to be used as a recommendation concerning the length of time a record should remain in an active records office or online (A) and the length of time it should be stored in a dormant area (D). This is indicated, for example, by recording "A-2, D-3" for a record having a five-year retention.

The potential value of records should be evaluated against the cost of storage when establishing records retention periods by avoiding exaggeration of the frequency of reference to records (e.g. an "active record" normally should be referenced 1-2 times per month to retain its status).

Conditions are reflected in the Comments section of these schedules. On the expiry of its retention period, the actions required are identified. This is usually the ultimate disposition of the records either by secure shredding, erasure or transfer to the archives. Other conditions may be indicated such as Consult Records Coordinator or After Superseded.

Disposition

The disposition indicated in these schedules is to be used to determine the handling of the document when it is no longer needed. Some documents may need to remain in storage until they are superseded or made obsolete. It is the responsibility of the OPI to inform the Records Coordinator of these changes and to update the storage records. Secure shredding of paper and erasure of electronic records will be done once the dormant period has passed. Those documents that are classified as archival will be kept permanently, but may require a different location for storage depending upon access and preservation needs. The disposition will use environmentally sound practices that emphasize recycling to handle any material.

Storage

What must be stored?

The retention periods outlined in a disposition schedules apply to "original," official corporate documents of the University. "Copies" or "duplicates" of any documents can be disposed when they are no longer required for reference purposes and they do not contain comments or quotes that may alter the purpose or direction of the record. These comments or quotes then become the record and should be maintained by the OPI. Records with administrative, legal, fiscal and long-term historical value must be retained for varying periods (even permanently) as determined by a records schedule.

How are they stored?

Active records are kept where they are readily available for use, either as a paper copy in the local office or as an active electronic file. Once a record no longer needs to be kept readily available, it becomes a dormant record that must be stored with sufficient information to determine the OPI, their creation and storage dates, their Retention and Disposition status and other relevant information as determined by policy. These records must be retrievable within an appropriate period of time based on any requests from their OPI or other authorized parties.

Disposition of records

Once the lifecycle of a record has expired, the record should be disposed in a safe and secure manner as described in the disposition section of the schedule. Electronic erasure of a computer file will be considered adequate for records. Any records stored in backups will be allowed to expire and the media reused.

Archived Files

Who decides if they are to be archived?

In consultation with the OPI, the Records Coordinator will determine if an institutional record needs to be archived due to its significance to the University. The goal of archived records is to preserve a historical record of the University for the future. These records must be stored and maintained in a manner that preserves the material from deterioration or damage or from technological change. A catalogue of archived items is maintained that includes information on the OPI, storage date and status of any archived material as well as any historical context for the material.

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Accessibility

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