



Northumberland

Community Futures Development Corporation
Société d'aide au développement des collectivités

Record Retention & Destruction Policy

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1.0 Objectives and Scope of Policy

The Northumberland Business Development Assistance Corp. has prepared this Policy Statement to outline Northumberland Business Development Assistance Corp.'s policy concerning the retention and destruction of records within the control of the Corporation. The Corporation wishes that decisions as to how long records are kept are made and applied in a systematic fashion. This is done in order to permit Northumberland Business Development Assistance Corp. to:

- ❑ Identify, protect, and preserve those records that need to be kept to meet business, legal, or historical requirements;
- ❑ Reduce Northumberland Business Development Assistance Corp. costs;
- ❑ Better manage Northumberland Business Development Assistance Corp. computer facilities by;
 - Eliminating the storage of unnecessary information on the Northumberland Business Development Assistance Corp. computer network or employee desktops;
 - Encouraging optimal performance of the Northumberland Business Development Assistance Corp. computer network;
 - Eliminating confusion over different iterations of documents;
 - Ensuring that important documents are not made unusable by technological upgrades; and
 - Ensuring, to the degree possible, the authenticity of electronic documents on the network and the employees' desktops;
- ❑ Protect Northumberland Business Development Assistance Corp. employees and management from the risks associated with the inadvertent or inappropriate destruction of Northumberland Business Development Assistance Corp. assets; and

- ❑ Support the protection of sensitive information by ensuring records are disposed of in an appropriate fashion.

For the purposes of this policy, records are defined as any recorded information that is created or received by any individual, whether employed or contracted by Northumberland Business Development Assistance Corp., in the course of conducting Northumberland Business Development Assistance Corp. business. It is particularly important to note that such records are the property of Northumberland Business Development Assistance Corp. and not the employee or contractor who created or received them. It is equally important to note that the definition of records applies regardless of the format or medium of the information. This would include paper, film, and electronic formats, such as text, image, voice, video, graphics, or e-mail messages – whether work-related or personal - created and/or stored on Northumberland Business Development Assistance Corp. desktop/laptop machines, personal digital assistants (should they be provided by Northumberland Business Development Assistance Corp.) or the TEA network. See Section 5.0 concerning electronic documents.

Final disposition of a record typically occurs through physical destruction or transfer to the Northumberland Business Development Assistance Corp. archives. When and how individual documents are disposed of depends on the retention requirements that are established for each set of records. These are defined by a variety of different factors, including both business needs and any statutory record keeping requirements.

2.0 Roles and Responsibilities

The General Manager, in conjunction with the Chief Privacy Officer, is responsible for ensuring that the records produced by Northumberland Business Development Assistance Corp., in the course of the Corporation conducting its business, are managed according to Northumberland Business Development Assistance Corp. policies and standards. This includes ensuring that appropriate retention requirements are defined and applied in the disposition of records.

The Chief Privacy Officer is also responsible for supporting the managers and employees in Northumberland Business Development Assistance Corp. Departments in the retention and disposition of records by providing guidelines and by facilitating the actual disposition of records. This formal and controlled disposition process provides evidence that Northumberland Business Development Assistance Corp. has exercised due diligence in the destruction of records.

With respect to records, managers are to ensure that they and the employees for which they are directly responsible comply with this policy. Employees have two key responsibilities under this Policy. First, is to treat transitory records in a manner consistent with this policy. Second, is to submit all other records to a reliable record-keeping system so that they can be disposed of in accordance with Northumberland Business Development Assistance Corp. standards.

3.0 Transitory Records

No records should be destroyed by individual employees with the exception of those that are transitory. Transitory records are defined as those that:

- Are not of enduring value;
- Are not needed for statutory, legal, fiscal, administrative, operational or archival purposes;
- Are needed only for a limited period of time (usually a week or less) to complete a routine action or the preparation of a record; and
- Are not regularly filed in a records or information system.

Transitory records may be considered as falling into seven general categories:

- Temporary information;
- Duplicates;
- Draft documents and working materials;
- Publications;
- Direct mail;
- Blank information media; and
- Personal notes.

Temporary information includes telephone messages, routing slips, post-it notes, opened envelopes, memos, notes and messages (either paper, voice or electronic) where the information has only immediate or very short-term value. Once they have been used to perform the required activities, the records have no further value and may be destroyed.

However, it is to be noted that records like this may need to be kept. For example, envelopes might be kept because the time and date of receipt are stamped on them. A telephone message slip may have to be filed as it provides evidence of an individual calling at a certain time and date. If there is any doubt about whether recorded information will have any further reference value, file the record.

Duplicates are exact reproductions of a master document. Examples of such records include photocopies, or extra copies printed from a computer system or by a commercial printer. After the master version of a document has been filed, duplicates that are no longer needed may be discarded. Duplicates that are circulated strictly for reference purposes should be clearly identified so they will not be filed. An important caveat to note is that a duplicate is sometimes altered by someone adding handwritten or electronic notes to it. This action creates a new record. If this added information is substantive and will have future value, file the document as a new record.

Draft documents and working materials includes source materials used in the preparation of documents and earlier versions of final documents. Usually, drafts and working materials, whether paper or electronic, do not have long-term value and can be discarded as transitory records. However, exceptions to this general rule do exist: drafts and working papers related to the preparation of legal documents, budgets, policies, standards, guidelines and procedures may not be transitory. If a manager believes that the information contained in such a record may have some future value to Northumberland Business Development Assistance Corp. then that record should be filed. If any employee is unsure as to the future value of a record, he or she should consult their manager.

Publications include books, magazines, periodicals, pamphlets, brochures, journals, newspapers and software documentation obtained from sources outside Northumberland Business Development Assistance Corp.. If they will have no future value, they can be discarded once a manager or employee is finished with them. The master copy of any publication produced by Northumberland Business Development Assistance Corp. is not transitory and should be filed.

Direct mail includes solicited or unsolicited information received from organizations or individuals advertising their products or services. The vast majority of such mail may be considered junk mail and may be discarded.

Blank information media includes anything that was created or acquired for the purpose of collecting or storing information but which has not been used and has become obsolete. Obsolete blank forms are a good example. This category also includes storage media such as video, audio, or dictation tapes, diskettes, magnetic tapes, disk drives, or optical disks, where sensitive or confidential information was previously stored or where that information was erased; and where it is possible that someone could

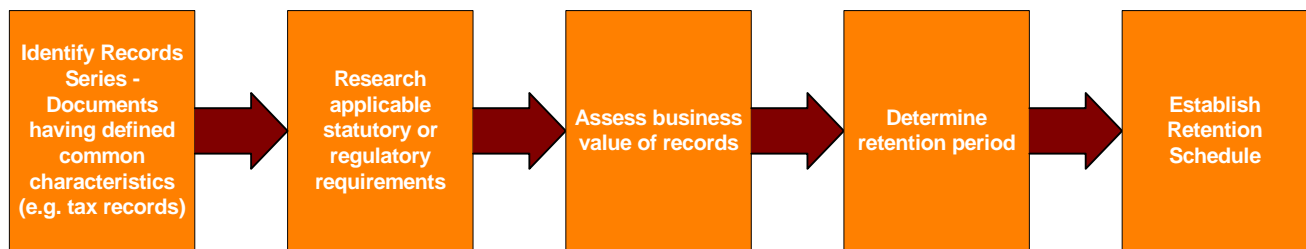
recover the erased information by technical means. Such “non-paper” items are either to be physically destroyed or erased in a secure manner by “overwriting”.

Personal notes include messages which are not directly related to the work of employees but does not include personal information needed for purposes of personnel management.

4.0 Development of Retention Requirements

Because this policy is designed to facilitate the routine, orderly and timely archiving or disposition of records by Northumberland Business Development Assistance Corp. managers and employees, it may become apparent that this policy fails to address certain classes of documents since new types of records or new media to hold records may be created over time. Accordingly, Annex A of this Policy may require amendment over time. This should be brought to the attention of the Chief Privacy Officer who shall determine (or have determined) the retention period for the record or class of records in accordance with the process described below.

This process of developing retention and disposal requirements is comprised of a small number of steps. As depicted below, the process begins with the identification of a series of records which represent broad categories of information that share common management requirements.



The research element is to identify any statutes or regulations that might apply to each records series. Some statutes outline very clear retention requirements for particular kinds of records, such as the *Income Tax Act*. Others identify more general requirements to create and retain records, but do not identify a specific time frame. One or more statutes may apply to any given set of records – sometimes with conflicting retention requirements which must be reconciled.

Once the research is completed, and whether or not there is a legal requirement, Northumberland Business Development Assistance Corp.’s business needs to retain the record is assessed. This is especially important in the absence of any legal requirement to retain. The specific retention periods, reflecting both business needs and any statutory and regulatory requirements, are then fixed. The retention requirements that result from this process are documented within the “Record Retention Schedule” which becomes the official guideline for how long records are to be kept.

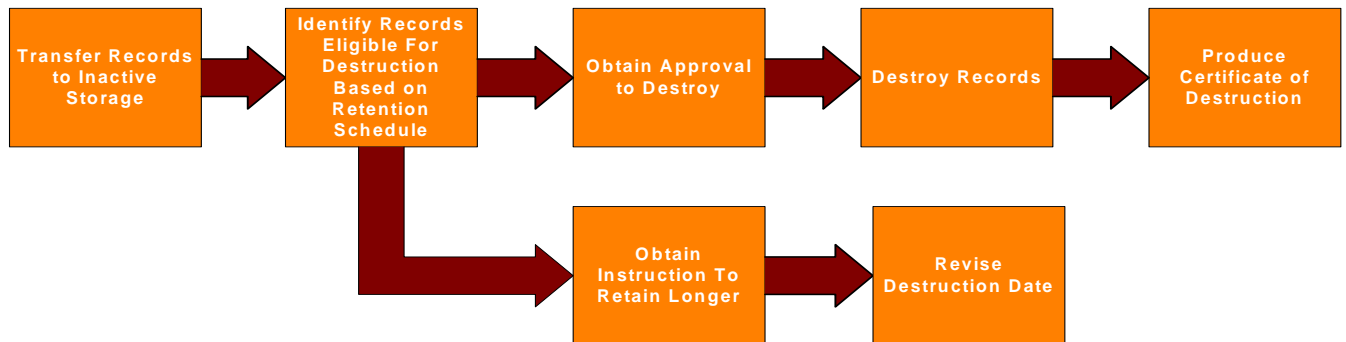
Northumberland Business Development Assistance Corp.’s development of a retention/disposition schedule is generally a one-time activity that addresses the broad administrative, financial, legal, audit and historical value of the Corporation’s record holdings. If records do not fit within existing categories of documentation then the process outlined above is to be employed. A copy of the current retention schedule for Northumberland Business Development Assistance Corp. documents is attached as Annex A.

5.0 Record Retention or Destruction

The attached Annex A has guidelines for the appropriate retention of numerous types of records. Records will ordinarily be kept in the Department creating a document unless otherwise directed to be

stored elsewhere. If, after consulting this policy and the schedule attached, there exists a question regarding the proper disposition or retention of a particular document or class of documents, it shall be the responsibility of the head of the department in possession of the document to determine the proper disposition of the item or items in consultation with the Chief Privacy Officer.

Application of the retention schedule occurs upon the disposition of actual record holdings. Most often this involves reviewing records that have been transferred to “inactive storage” to determine those that are eligible for physical destruction or transfer to the Northumberland Business Development Assistance Corp.’s archives. The following diagram illustrates the process that is followed in applying the guidelines found in Annex A to Northumberland Business Development Assistance Corp. record holdings.



At least once a year, using the retention schedule in Annex A as a guideline, all files that are scheduled to be destroyed are to be listed. The list is provided to the General Manager who will either approve final destruction or advise whether they should be retained for an additional period of time. This process serves as a final check on the initial retention decision and also allows for the application of any changes in requirements.

Once approval to destroy is obtained, records are to be physically destroyed and the Certificate of Destruction, in the form contained in Annex B, is completed and filed in the Chief Privacy Officer’s Office. This provides a record of what has been destroyed and is used as an audit trail if destruction practices are questioned.

Paper or electronic records, other than sensitive, financial or confidential records, may be disposed of in the following manners:

- Recycling;
- Shredding;
- Placement in garbage for regional landfill;
- Physically destroyed; or
- Erased in a secure manner by overwriting.

Sensitive, financial or confidential records must to be shredded or erased in a secure manner before disposal. What constitutes “sensitive” information is left to be determined at the discretion of the manager concerned or the Chief Privacy Officer who are to err on the side of caution if there is any doubt as to the sensitivity of any information scheduled for disposition.

No employee is to retain any “private” or “secret” files. Retention of such files is grounds for dismissal.

No tape recordings are to be retained. Meetings, other than hearings, may only be taped with the approval of the Chief Privacy Officer and such tapes must be erased immediately after the preparation of the report.

Employees who knowingly destroy, without authorization, any of the Corporation documents will be immediately suspended pending an inquiry by the Chief Privacy Officer, the employee may be subject to disciplinary measures up to and including termination. If it is found that the employee knowingly destroyed documents related to litigation or to complaints, the employee will be subject to disciplinary measures up to and including termination.

6.0 Electronic Documents

With respect to their obligations in retaining electronic documents - including e-mail, Web files, text files, PDF documents, and all other formatted files - managers and employees are to refer to this section of the record retention policy.

6.1 Electronic Document Types and Guidelines

Unless otherwise listed for retention in Annex A and subject to Section 7.0, the following are the types of electronic documents covered under this policy and the corresponding period of time in which each document should be retained. Other formats may be added as necessary.

E-mail - In addition to the employee's obligations regarding e-mail contained in Northumberland Business Development Assistance Corp. *Information Security Policy*, the employee must delete all e-mail - either from internal or external sources after six (6) months. Employees will strive to keep the majority of their e-mail related to business issues. In case the e-mail needs to be referenced or retrieved, the IT department will archive e-mail upon request for six months after the employee has deleted it, after which time the e-mail will be permanently deleted. Employees will not store or transfer Northumberland Business Development Assistance Corp.-related e-mail on non-work-related computers. Employees will take care should they be required to send confidential/proprietary Northumberland Business Development Assistance Corp. information to outside sources. Any e-mail an employee deems vital to the performance of their job should be stored.

Voice mail – Voice mail is transitory in nature and may be deleted at will. There are times, however, where voice mail may require a longer retention period. For example, this may be the case where the message may be potentially used as evidence in a legal or regulatory proceeding.

Web page files—Employees will delete Web page files saved on the network or their local machines after one (1) year. This includes such pages saved from Web sites onto an employee's laptop/desktop.

Text/formatted files—Employees will conduct annual reviews of all text/formatted files (e.g., Microsoft Word documents) and will delete all those containing personal information and those they consider unnecessary or outdated. Text/formatted files the employee deems vital to the performance of his or her job should be printed and stored in the employee's workspace.

Spreadsheets—Spreadsheets other than those required to be retained by Northumberland Business Development Assistance Corp. for tax reasons shall be retained for approximately one (1) year or until Northumberland Business Development Assistance Corp.'s next budget year, whichever is the earlier. Only those employees with access to Northumberland Business Development Assistance Corp. accounting information are permitted to delete spreadsheets.

PowerPoint presentations—All PowerPoint presentations should be deleted once they have served their useful purpose or after one (1) year whichever is the earlier.

PDF documents—Employees will delete PDF files from their network shares and/or laptops and desktops once they have served their useful purpose or after one (1) year, whichever is the earlier.

If it has been determined that an electronic document is required to be retained and it is printed or transferred to another media for longer term storage, all relevant information associated with the electronic document must also be stored. For example, header information on an e-mail would be stored in the original electronic form and should not be lost if the e-mail is printed and stored.

6.2 Compliance

Northumberland Business Development Assistance Corp. does not currently employ the means to automatically delete electronic files beyond the dates specified in this policy. Because of this, it is vital that employees adhere to this Policy. Each year, the Northumberland Business Development Assistance Corp. will choose one employee at random and check their user shares on the network and their laptops/desktop to ensure they are in compliance. Files that are beyond the designated retention date will be deleted in accordance with this policy.

7.0 Suspension of the Destruction or Disposal of Records

There are some instances where records must be held beyond the established retention period because of a complaint against an Northumberland Business Development Assistance Corp. Client, a privacy request, an audit, litigation, or the possibility of litigation that either does or may involve Northumberland Business Development Assistance Corp..

Northumberland Business Development Assistance Corp. will suspend the application of a record retention schedule to a record or class of records:

- 1) Upon becoming aware of an allegation, claim, audit, investigation or pending claim, audit or investigation directed at Northumberland Business Development Assistance Corp.;
- 2) Where required by law or by order of a tribunal;
- 3) Where it is necessary to permit the Northumberland Business Development Assistance Corp. to pursue available remedies or limit any damages that it may sustain; and
- 4) Upon written notice of the commencement against a Client or employee of:
 - a) a judicial proceeding;
 - b) an administrative, regulatory or professional investigation;
 - c) a proceeding arising from an administrative, regulatory or professional investigation; or
 - d) an investigation by law enforcement or national security authorities;

The Chief Privacy Officer, or manager as directed by the Chief Privacy Officer, will create a list of records, or classes of records, for which destruction is to be suspended and attach any supporting rationale that can explain the reason for suspension. The list should provide as many details of the records to be frozen as required. Once notification of the requirement to suspend destruction or disposal is received from the Chief Privacy Officer or Manager, managers and employees will retain the affected records and suspend their destruction until appropriate notification to the contrary is received. The form of notice is found in Annex C. This notice provides a record of what has *not* been destroyed and is used as an audit trail if destruction practices are questioned. This suspension of destruction or disposal also applies to transitory records and electronic documents.

8.0 Enquiries

Any enquiries relating to the application of this policy should be directed to the Chief Privacy Officer.

Annex A

Document Retention Schedule

Item/Material	Responsible Department	Storage Location	Length of Retention	Remarks	Disposal
Building Plans – Address	Chief Privacy Officer	Chief Privacy Officer's Office/Building Superintendent	Permanent.		
By-Law Amendments	Chief Privacy Officer	Executive Assistant's Office	Permanent.		
Annual Reports	Chief Privacy Officer	Library Executive Assistant's Office	Permanent.		
Items of Historical Interest	Chief Privacy Officer	Executive Assistant's Office	Permanent.		
Reports of Board of Directors	Chief Privacy Officer	Executive Assistant's Office	Permanent.		
Corporation Newsletter	Chief Privacy Officer	Executive Assistant's Office	Current plus previous 2 years.		
Legal Cases	Chief Privacy Officer	Executive Assistant's Office	Permanent.		
Contracts	General Manager	Executive Assistant's Office	Permanent.		
*Personnel Records (personal information) (not payroll)	Chief Privacy Officer	General Manager's Office	10 years after termination or retirement.		Shred
Policy Letters	Chief Privacy Officer	Executive Assistant's Office	Permanent.		Shred
*Dispute Documentation	Chief Privacy Officer	Executive Assistant's Office	Arbitration – retain for one year then retain permanently only final decision letter and signed undertakings. Mediation – retain signed undertakings.	Do not retain files of matters settled through mediation once both parties have fulfilled their obligations.	Shred
Correspondence with Lawyers	Chief Privacy Officer	Executive Assistant's Office	Permanent.		

Item/Material	Responsible Department	Storage Location	Length of Retention	Remarks	Disposal
CFDC Statistics for Industry Canada	General Manager	Executive Assistant's Office	Year End and Year-to-Date statistics – Permanent. Quarterly Report Statistics – Current year plus previous two years.		Shred
Policy and Procedure Manuals/Handbooks	General Manager	Executive Assistant's Office	Retain one copy until superseded and dispose of when no longer of reference value.		
Financial Statements - Audited & Corporation-produced	Accounting Services	Manager, Accounting Services	Permanent.		
Facility Use Agreement	Accounting Services	Accounting Services	Current year plus 2 years.		Shred
Budgets	Accounting Services, Manager	Accounting Services	Current plus previous 3 years.		Shred
Special Event Registration i.e. Trade Show Exhibitors, Golf Tournament sponsors	Client Services	Client Services	Current plus previous year.		Shred
Installation of Computer	Manager	Administration	Until a new system is installed.		Recycle
Internet Connections Request	Manager	Administration	Dispose after work is completed.		Shred
*Subscriber Agreement (ie Access to E-Learning PIN Account)	Administration	Administration	Permanent, or 12 months after Corporation no longer offers this service to Clients.		Shred
*Client Records - Active - Inactive	Loans Officer	Loans Officer	All active retained. Inactive – for 5 years. Electronic records – permanent.		Shred
Un-numbered letters and memos to Clients	Administration	Administration	One year plus current.		Shred
Client Notice of address / name change	Administration	Administration	All active retained. Inactive – for 5 years.		Shred

Item/Material	Responsible Department	Storage Location	Length of Retention	Remarks	Disposal
Application for new / reinstatement: Business/Branch/Sole proprietor	Loans Officer	Loans Officer	All active retained. Inactive – for 5 years.		Shred
Client of CFDC Notice of Business Change / New Officer or Director	Loans Officer for Client Administration for CFDC	Loans Officer	All active retained. Inactive – for 5 years.		Shred
Application for active Client; Application for new	Loans Officer	Loans Officer	All active retained. Inactive – for 5 years.		Shred
Pension Plan/Health Plan	Accounting Services	Accounting Services	Permanent.		
*Personnel Records (Payment Information) - Present - Previous	Accounting Services	Accounting Services	6 years after termination or retirement.		Shred
*Financial Records	Accounting Services	Accounting Services	Current plus previous 7 years.		Shred
Emergency Contacts	General Manager	Accounting & General Manager's Office	Forms for current employees only.		Shred
*Client Enrollment Registered Pension Plan – Company Name	Accounting Services	Accounting Services	Permanent.		
Application for Group Coverage – Insurance Company Name	Accounting Services	Accounting Services	Permanent.		
*Tax Return Information	Accounting Services	Accounting Services	Retain current staff - former staff – dispose after 10 years.		Shred
*Financial Records - purchase orders	Accounting (with invoice) Administration (in sequence)	Accounting Administration	Current plus previous 7 years. Current plus 2 years.		Shred Shred

Item/Material	Responsible Department	Storage Location	Length of Retention	Remarks	Disposal
*Northumberland Business Development Assistance Corp. Auto Debit Service – Account Information *Northumberland Business Development Assistance Corp. cheques (for Auto Debit to Banks) *Northumberland Business Development Assistance Corp. Auto Debit Service – credit card information	Accounting	Accounting (locked cabinet)	Current Clients – Permanent. Former Clients – within 12 months of termination.		Shred
*Non-Payment of monthly loan repayment Information	General Manager/ Accounting	Executive Assistant's Office/ Accounting	2 years for correspondence and internal memos.		Shred
Committee Files	Each Committee Liaison	Office of each Committee Liaison	Current plus previous 2 years.	Liaison to determine if some should be retained.	Shred
General Correspondence	All	Department	Retain 2 years, then dispose.		Shred
E-Mail Messages	Each staff	PCs	Current & previous 6 months unless filed by subject area and required for future reference.		Delete
Electronic Files				Refer also to Information Security Policy	

* Complete Annex B before destruction.

Annex B

Northumberland Business Development Assistance Corp. Certificate of Destruction

The records identified below have been qualified for destruction:

General Description of Records

Specific Description

Record Series

Inclusive Dates (From/To)

Method of Disposal:

- Recycling;
- Shredding;
- Placement in garbage for regional landfill;
- Physically destroyed; or
- Erased in a secure manner by overwriting.

Media:

- Paper
- Magnetic tape
- Microfilm
- Optical disc

Destroyed on: _____
Date

Destroyed by:

Name _____

Signature _____

Destruction authorized by _____

Annex C

**Northumberland Business Development Assistance Corp.
Records Destruction HOLD/RELEASE Notice**

- DESTRUCTION HOLD
Suspends destruction of all records described below until further notice

- DESTRUCTION RELEASE
Records may be destroyed according to the established retention schedule

General Description of Records

Specific Description

Record Series

Inclusive Dates

Department Manager: _____ Date: _____

**AUTHORIZATION
For Records Management Use Only**

Chief Privacy Officer: _____ Date: _____