

Student Records Retention and Disposal Policy

I. Policy

This Policy addresses the retention and disposal of East-West College's Records as defined in Section II below. The College requires that Records be retained for specific periods of time, taking into account legal or other institutional requirements.

The retention periods set forth in the attached Records Retention and Disposal Schedule are the minimum retention periods required by East-West College. At the conclusion of the retention period, the Records should be properly disposed of under this Policy. Requests to deviate from or modify this Policy or these retention periods must be made to and approved by the College Records Retention and Disposal Committee.

This Policy sets forth procedures to manage the retention and disposal of these Records, and is intended to ensure that the College:

- meets legal standards;
- properly manages the use of electronic and physical storage space;
- preserves the history of the College;
- disposes of outdated Records.

No one person or unit can be directly responsible for all College Records. Therefore, every office or department managing College records is responsible for:

- Implementing records management practices consistent with this Policy.
- Educating staff in the Records management practices.
- Preserving Records as required under this Policy.
- Properly disposing of Inactive Records at the end of the applicable retention period.
- Protecting Records against misuse, misplacement, damage, destruction, or theft.
- Monitoring compliance with this Policy.

College Records are the property of the College and not of the officers, faculty members, or employees who create them or to whom they are entrusted.

II. Types of College Records

Record: Any type of record created or received in the course of College business, including, but not limited to, paper, email, any type of electronic file or data, still photographs, motion pictures, drawings, plans/blueprints, and audio/video recordings, etc.

- An **Active Record** is any Record that is currently in active use by an office or function of the College.
- An **Archival Record** is an Inactive Record that has permanent or historic value and is not required to be retained in the office in which it was originally generated. Archival Records are retained in the College Archives.
- An **Electronic Record** is a Record kept in an electronic format, such as a word processing document, a spreadsheet, a database, a scanned or imaged document, and any other type of file stored on a computer, server or mainframe storage device or medium, or on any external or off-site storage medium, or with a third party acting as the College's agent. Electronic Records have the same retention periods as paper and other tangible Records.
- An **Inactive Record** is a Record that is no longer an Active Record but still must be maintained pursuant to the Records Retention Schedule set forth below. Inactive Records are typically maintained at an off-site storage facility or at other locations on campus; however, Inactive Records of historical significance are maintained by the College Archives.
- A Record with **Personal Information** is a Record that include an individual's name or personal mark together with that individual's social security number; drivers license number or other government identification card number; financial account number, credit or debit card number, or any number or code which may be used alone or in conjunction with another piece of information to assume the identity of another person, access financial resources, or obtain credit information. Personal Information is highly sensitive and must be safeguarded and secured at all times.
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III. Records Retention and Disposal Committee

The College shall convene a Records Retention and Disposal Committee to guide the College in the implementation, monitoring, and periodic review of this Policy and compliance by the College with this Policy. The Committee shall include a chair, who will be designated the College's Records Retention and Disposal Officer. The Committee shall include representatives from the offices of all of the affected schools, departments, programs and other areas deemed appropriate by the Committee, each of whom shall be designated the Records Officer for his/her respective area.

IV. Retention of Records

The attached Records Retention Schedule lists different types of Records and the length of time those Records must be retained. Since no document list can cover all situations, questions regarding the retention period for a specific document or class of documents not included in the Records Retention and Disposal Schedule should be addressed to the Office of Legal Counsel. All Records pertaining to ongoing or pending audits or lawsuits (including reasonably anticipated lawsuits) should not be destroyed, damaged, or altered, even if the records retention date has expired, until the matter has been resolved and you have been specifically advised in writing by the Records Retention and Disposal Committee or the Office of Legal Counsel that such Records may be destroyed. If you have reason to believe that a Record scheduled for destruction may pertain to any of these matters, do not destroy the Record and contact the Office of Legal Counsel.

V. Disposal of Records

If the record retention period has expired and the Record is not appropriate for the College Archives, the Record should be recycled or destroyed.

Most of the Records that the College maintains do not contain Personal Information pertaining to individuals. Disposal of Records without Personal Information may be made by any appropriate means, including recycling of paper Records. Disposal of electronic Records, including emails, should be made in conjunction with the IT department. Formats that hold electronic media may be overwritten or physically destroyed, but not placed in the trash.

Storing or disposing of Records that contain Personal Information requires special consideration. Provincial and Federal rules and regulations will be followed in case of disposal of Personal Information, such as (a) shredding the Record; (b) destroying the personal identifying information contained in the Record; (c) modifying the Record to make the personal identifying information unreadable; or (d) taking reasonable actions consistent with commonly accepted industry practice.

VI. College Records Disposal and Storage Resources

Disposal and Storage Resources

- **Archives**
The Department of Archives and Special Collections is the repository for College Records and includes such items as commencement programs, yearbooks, college catalogs, blueprints, photographs, correspondence and office files relevant to the history of the College.
- **Electronic Media and Equipment**
Electronic records have the same retention periods as tangible records. Further inquiries should be directed to either the legal counsel or Department of Information Technology.

- **Recycling**
East-West College complies with all existing rules and regulations promulgated by the City of Calgary’s Department of Sanitation.

- **Shredding**
Departments within East-West College utilize external vendors for the disposal of records through designated pick-up dates, times and locations.

- **Storage Facilities, Campus and Off-Site**
Departments use their own discretion when determining where to maintain their respective records. Records are typically maintained on-site but others may be housed at alternative locations.

VII. Additional Information

This Policy was drafted after a review of the policies of peer institutions. While the Policy and Records Retention Schedule identify many of the Records at the College, they do not cover all documents or situations and may be updated to reflect best practices or changing legal requirements.