Records Management

Approved by: Vice-President, Corporate Security and Compliance
Last Reviewed: March 2016

Purpose

This policy provides direction to assist employees and contractors in efficiently managing recorded information in accordance with legislated requirements and outlines the roles and responsibilities associated with BCLC's Records Management Program.

SCOPE

This policy applies to all BCLC employees and Contractors.

CONTEXT

All Records created or received by BCLC in the transaction of business, or the conduct of its affairs, are considered government Records. As such, BCLC identifies and manages Records within its Custody and Control, regardless of the form or medium, in accordance with the *Information Management Act*, British Columbia, and the Government of British Columbia's Recorded Information Management Manual.

BCLC retains and disposes of government Records in accordance with approved Administrative Records Classification System (ARCS) and Operational Records Classification System (ORCS) Records Schedules. Records Schedules, when properly followed, make certain that Active and Semi-Active Records are retained for the period of time required to meet legal, operational, audit, fiscal and other requirements of government. A Records Schedule also identifies Records with enduring value and provides for their transfer to government archives. Finally, Records Schedules provide for the timely destruction of Inactive Records when they are no longer required to support BCLC's functions.

Employees and Contractors are also required to comply with statutory requirements for access to information and protection of privacy under the *Freedom of Information and Protection of Privacy Act*, British Columbia, *(FIPPA)* and direction provided in BCLC's Privacy Policy and Managing Freedom of Information Requests policy. Requirements associated with the classification of information are contained in BCLC's Information Classification policy and must also be observed.

POLICY STATEMENT

BCLC has established a Records Management Program to make certain that BCLC is in full compliance with provincial legislation, improve operational and administrative efficiency, reduce risk and manage Records as valuable organizational assets. The Records Management Analyst is designated as BCLC's Records Officer in accordance with government requirements.

Records Management

All employees and Contractors have a role in the Records Management Program and are responsible for managing Records under their control. Records may be either Transitory Records or required for ongoing purposes. Employees and Contractors need to create and keep complete and accurate Records sufficient to document their decision-making and work activities. This applies to Records in all formats that provide the best evidence of business activities, transactions, policy or decisions. If a Record is required for ongoing legal, fiscal, audit, administrative or operational purposes, it must be transferred to a Shared Electronic Record Keeping System or paper filing system suitable for retention of ongoing Records. If a Record meets the criteria for a Transitory Record, it should be disposed of by the employee or Contractor as soon as it is no longer required, provided it is not subject to a Records Hold.

In support of the Records Management Program, each Director is required to appoint at least one Records Lead for their Organizational Unit, depending on the size of the Organizational Unit. The Information Management Team will provide ongoing support and resources to the Records Lead to assist them in managing the Records of the Organizational Unit.

All employees appointed as their Organizational Unit's Records Lead will be provided with training by the Information Management team so that Records Leads can keep current in all aspects of their responsibilities.

POLICY DETAILS

Email, Text and Instant Messaging

There is no single retention for all email. Retention of email messages depends on the functions and content of the message. Employees and Contractors are asked to pay attention to emails that protect financial, legal and other rights of BCLC and of persons directly affected by BCLC actions. This includes emails that contain information about executing policies, decisions and actions, legal advice, personnel matters, contract and bid information. Emails that are required for ongoing purposes are to be transferred to a Shared Electronic Record Keeping System. The Managing Email Guideline provides additional guidance for employees and Contractors in this regard.

Text or instant messaging should not be used where a business Record of the communication is required to be retained.

Contracts with Service Providers

Records of BCLC's casino, community gaming and bingo service providers (Service Providers) and lottery retailers are within BCLC's Custody and Control if they fall within BCLC's mandate to conduct and manage gaming on behalf of the B.C. Government. As such, all Service Provider and lottery retailer contracts must contain provisions regarding the custody, control, retention, disposition, use and security of, and access to, those Records.

Records Management

Storage

Each Organizational Unit must maintain a Shared Electronic Record Keeping System. Employees are to store Active Records in a manner that ensures they are accessible to the Records Lead of their Organizational Unit, either in a paper file or on their Organizational Unit's Shared Electronic Record Keeping System. Storing Records in employee-specific network drives or email folders does not satisfy this requirement. Additional guidance on the proper use and maintenance of a Shared Electronic Record Keeping System can be found in BCLC's Managing Records on a Shared Electronic Record Keeping System Guideline.

BCLC uses government-approved records centres for the off-site storage of its Semi-active Records.

Final Disposition of Records

The disposition of Inactive Records can occur by:

1. Transferring the Record to the government archives – Records of enduring value must be retained and remain accessible until they are transferred to the legal custody of the government archives.
2. Physical destruction – Destruction of Records that are eligible to be destroyed must be in accordance with BCLC's Disposal of Physical Media Procedure.

Approval is required from the Records Management Analyst prior to the destruction of any Inactive Record. This does not apply to Transitory Records as all employees and Contractors are authorized to dispose of Transitory Records as soon as their business use ends, unless the Transitory Record in question is subject to a Records Hold.

Records Holds

A Records Hold requires the retention of all Records within the scope of a specific legal or business matter. This includes Transitory Records not yet destroyed at the time the need for a Records Hold is identified. A Records Hold supersedes the Records Retention Schedule, and Records subject to the Records Hold must be preserved even if the applicable retention period under the Records Retention Schedule has expired. Upon the identification of any event that necessitates a Records Hold, Information Management must be notified immediately to suspend the destruction process for any relevant Records.

Employee Transition

All employees are responsible for properly managing Records in their control prior to their departure from BCLC or when changing roles within BCLC. Records created or received in the course of BCLC business are and remain the property of BCLC and the B.C. Government. In circumstances where an employee's departure occurs with short notice, the Records are to be reviewed by the employee's manager, or designate, to make certain the records are managed properly.

Records Management

ROLES AND RESPONSIBILTIES

Records Management Analyst is responsible for:

- Providing training and support to the Records Lead;
- Assisting with the transfer of Records to offsite storage;
- Acting as liaison with the Government of British Columbia;
- Authorizing final disposition of Inactive Records;
- Co-ordinating, developing, and implementing a Records Management Program that makes certain that Records Leads have the resources, procedures and training they need to maintain Records in all media; and
- Communicating all Records Holds to the required Organizational Units.

Directors are responsible for:

- Appointing the Records Lead;
- Providing the Records Lead with support and sufficient resourcing to effectively manage the Records of their Organizational Unit; and
- Maintaining a Shared Electronic Record Keeping System for the Organizational Unit that is organized and administered in accordance with Information management legislation and policy.

Records Leads are responsible for:

- Training staff in their designated Organizational Unit on the Records Management Program and the use of Record Schedules;
- Ensuring Records in their Organizational Unit are classified, transferred to offsite storage, and destroyed in accordance with ARCS and ORCS;
- Acting as the Organizational Unit's key contact for the Records Management Program; and
- Providing ongoing assistance and advice to employees in their Organizational Unit on properly managing the Records in their control.

All BCLC employees and Contractors are responsible for:

- Documenting their work by ensuring non-Transitory Records they create or receive are filed in their Organizational Unit's Shared Electronic Record Keeping System;
- Completing all Records management training that may be provided by their Records Lead or Information Management;
- Applying the Records Schedule for their Organizational Unit to properly manage Records in their control;
- Seeking assistance or direction from the Records Lead when uncertain about the proper management of Records; and

- Upon identification of an event that requires a Records Hold, notifying Information Management.

Legal Services is responsible for:

- Notifying Information Management that a Records Hold is required upon becoming aware of a pending legal action or issue.

DEFINITIONS

Active Record – means a Record that is in current use and needs to be retained and maintained in office space and equipment close to users.

Contractor – means an individual engaged to provide professional services to BCLC with access to BCLC systems and information.

Control (of a Record) – means the power or authority to manage the Record throughout its life cycle, including restricting, regulating and administering its use or disclosure.

Custody (of a Record) – means having physical possession of a Record, even though BCLC does not necessarily have responsibility for the Record. Physical possession normally includes responsibility for access, managing, maintaining, preserving, disposing, and providing security.

Inactive Records – means a Record that is no longer required for ongoing business. These are Records that are ready for final disposition.

Organizational Unit – means an entity within BCLC that operates as a distinct function, such as a department, project team or committee.

Record – has the meaning ascribed to it in the *Interpretation Act* and, as at the date of the policy, includes books, documents, maps, drawings, photographs, letters, vouchers, paper and any other thing on which information is recorded or stored by any means whether graphic, electronic, mechanical or otherwise.

Records Hold – is the process BCLC uses to preserve all forms of relevant Records that are reasonably anticipated as being required for legal or business purposes such as, litigation, arbitration, audits, FOI requests, government investigations and operational events. It includes an obligation to identify, locate and maintain information that is relevant to specific, predictable and identifiable legal or business matters.

Records Lead – means the designated employee from each Organizational Unit who will be the primary Records Management contact. This role requires in-depth knowledge of the Organizational

Records Management

Unit's Records and access to that knowledge.

Records Schedule – means a prescribed timetable that governs the life cycle of a Record from creation, through active use within an office, retention in off-site storage during its semi-active period, to final disposition when it becomes inactive.

Shared Electronic Record Keeping System – means a filing system in which Records are captured, protected, retained and destroyed in accordance with approved retention schedules, and includes files shares and SharePoint sites.

Semi-active Record – means a Record that is used only occasionally and therefore need not be maintained in the office space and equipment of BCLC. Semi-active Records still retain administrative, operational, fiscal, audit or legal value for BCLC.

Transitory Record – means a Record of temporary usefulness that is only required for a limited period of time for the completion of a routine action or the preparation of an ongoing Record. Transitory Records are not required for financial, legal, audit or other statutory purposes.

RELATED MATERIAL

Disposal of Physical Media Procedure
Managing Records on a Shared Electronic Record Keeping System Guideline
Managing Email Guideline

POLICY OWNERSHIP

Contact Position	Records Management Analyst
Policy Owner Position	Director, Information Management
Approving Body	Vice President, Corporate Security and Compliance

REVISION HISTORY

Version Number	Approval Date	Approved by	Amendment
2.1	Oct 13, 2016	Director, Information Management	Minor amendments. Change in policy ownership to the Director, Information Management, and associated changes to department names. Legislative references were updated to the *Information Management Act* and the definition for a Record was revised to align with the *Interpretation Act*.

Records Management

2.0	Mar 30, 2016	Vice-President, Corporate Security and Compliance	Policy was moved into the current template. Major revisions made to all sections of the policy to reference the Records Management Program and to include associated policy direction and assign roles and responsibilities.
1.1	Jan 29, 2015	Vice-President, Corporate Security and Compliance	Change in Ownership
1.0	Feb 2, 2009	President and CEO	Inaugural document.

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