



Office of the Chief Information Officer

# Guideline

## Disposal of Records

### Governance

Authority: MOIA

Audience: Information Management professionals and other resources responsible for the implementation and operation of a records and information management system (also referred to as an Information Management Program) within a department or other public body, as defined in the Management of Information Act.

Compliance Level: Recommended

Issuing Public Body: Office of the Chief Information Officer  
Application and Information Management Services  
Information Management Services

Original Issue Date: 2011 06 15

Date Last Reviewed: 2022 05 06

OCIO Reference: DOC03309/2011

Version Number: 3.0

**Notice:**

The Office of the Chief Information Officer (OCIO) is mindful of creating and delivering accessible materials, in line with the Government of Newfoundland and Labrador's Accessible Communications Policy. New materials created by OCIO align with policy requirements and modifications to existing materials will occur as part of the standard review cycle.

This document is available in alternate format. Please contact [OCIO@gov.nl.ca](mailto:OCIO@gov.nl.ca).

Forward questions and/or comments related to this document to [IM@gov.nl.ca](mailto:IM@gov.nl.ca).

## Table of Contents

<b>1.0 Overview</b>	<b>4</b>
<b>2.0 Purpose</b>	<b>6</b>
<b>3.0 Definitions and Acronyms</b>	<b>7</b>
<b>4.0 Recommended Approach</b>	<b>10</b>
4.1 Understanding Records Disposal.....	11
4.2 Records Identification and Disposal .....	11
4.2.1 Government Records.....	13
4.2.2 Transitory Records .....	13
4.2.3 Cabinet Records .....	14
4.2.4 Publicly Released Documents .....	14
4.2.5 Abandoned Records.....	15
4.2.6 Active versus Semi-Active Records .....	15
4.3 Implementing Disposition Authorities .....	16
4.3.1 Authorities requiring GRC Approval.....	16
4.3.2 Authorities that do not require GRC Approval .....	18
4.3.3 Disposal Process.....	18
4.3.4 Variances in the Disposal Process.....	20
4.4 Executing Disposal.....	21
4.4.1 Master Standing Offer Agreements.....	21
4.4.2 Secure Destruction .....	21
4.4.3 Paper/ Microforms .....	21
4.4.4 Electronic Records on the Shared / Network Drive .....	23
4.4.5 Electronic Data .....	23
4.4.6 Transfer of Records.....	23
4.5 Monitor and Verify .....	23
<b>5.0 Roles and Responsibilities</b>	<b>24</b>
<b>6.0 Supporting Materials and Version History</b>	<b>25</b>
<b>Appendices</b>	<b>27</b>

## 1.0 Overview

This Disposal of Records Guideline outlines requirements for the secure disposal of government records, including 1) disposal requirements for different record types; 2) disposal authorities and how they are implemented; and 3) disposal options including secure destruction, transfer of records to The Rooms Provincial Archives for permanent preservation, and transfer to another entity.

Disposal of records refers to the implementation of disposition through records retention, destruction or transfer decisions. These decisions are typically documented in disposition authorities as part of an organization's Information Management (IM) Program.

Section 6.0 of the Management of Information Act (MOIA) requires that all departments and other public bodies:

- 1) Shall develop, implement and maintain a record management system for the creation, classification, retention, storage, maintenance, retrieval, preservation, protection, disposal and transfer of government records;
- 2) Will implement a system that provides for retention periods and disposition by either destruction, or transfer to the archives, in accordance with the guidelines and schedules established by the Government Records Committee (GRC);
- 3) Shall ensure that the retention, disposal and removal of government records is carried out in accordance with the MOIA.

Without a proper approach to dispose of records in a timely and legally authorized manner, a department or other public body may have to address:

— Inefficient use of resources, including:

- Budget unnecessarily spent on storage space;
- Time and resources wasted on inefficient search and retrieval; and/or
- Cost to process information requested by legal authorities or through access to information requests that is no longer necessary for the organization's business and which could have been legally destroyed under an appropriate disposition authority.

- Legal action against the Government of Newfoundland and Labrador and/or individuals working on behalf of a department or other public body if information is disposed of without appropriate authorization.

Under the MOIA and OCIO-issued policy instruments, individuals are not authorized to dispose of records unless approved in a disposition authority. Disposition of records within departments and other public bodies can only be carried out in one of two ways:

- 1) Implementing a GRC approved disposition authority (i.e., Records Retention and Disposal Schedule (RRDS) for Operational Records, One Time Disposal (OTD) Submission, or Corporate Records Information Management Standard (CRIMS)); or
- 2) Implementing a disposition authority that does not require GRC approval (i.e., authorized transfer of records to another entity, under the Transitory Records Directive).

Guidelines are recommended actions, general approaches and operational behaviors. Guidelines are generally a description that clarifies what should be done and how to achieve the objectives set out in policies, directives and standards.

Guidelines issued by OCIO provide a recommended approach, as they take into consideration the varying nature of information management programs.

## 2.0 Purpose

The Disposal of Records Guideline provides a recommended approach that will serve to drive the design, development, implementation and management of an effective IM Program. This Guideline is part of a broader GuideBook that supports the requirement set forth in the MOIA for permanent heads of departments and other public bodies to implement a records and information management system.

The GuideBook, also known as the Guide to IM for Public Bodies, includes the following guidelines.



Graphic: 1 - GuideBook Contents

### Expected Deliverable(s)

- 1) The implementation of a secure records disposal processes that support compliant disposal practices using approved disposition authorities.

### 3.0 Definitions and Acronyms

A complete listing of terms are located on the OCIO website - Information Management and Protection (IM&P) Glossary of Terms.

**Corporate Records Information Management Standard (CRIMS)** – CRIMS is an information management standard (classification plan and records retention and disposal schedule) used for the management of corporate records of the Government of Newfoundland and Labrador’s departments and other public bodies, as defined under the Management of Information Act (MOIA). (Source: OCIO)

**Disposition** – Disposition is the range of processes associated with implementing the final stage in the life cycle of a record. Disposition could include destruction, transitory, transfer decisions and permanent retention by departments or other public bodies. (Source: OCIO). Further information can be referenced in ISO 15489-1:2016.

**Disposition Authority** – A disposition authority is the written authorization for a public body to carry out the range of processes associated with the final stage in the lifecycle of a record, including retention, destruction, transfer, or transitory activities. (Source: OCIO).

**One Time Disposal Submission** – The OCIO defines a One Time Disposal (OTD) Submission as a disposition authority, which applies to records in any format and authorizes, once approved, disposal of records in a legal manner. The OTD can be for records of a specific branch, division or program within a department or other public body. It can encompass all types of records within an organization, or may be limited to specific record types or record series but does not include active or semi active records. (Source: OCIO)

**Public Body** – As defined under the MOIA, a public body is:

- i) a department created under the Executive Council Act or a branch of the executive government of the province,
- ii) a corporation, the ownership of which, or a majority of shares of which, is vested in the Crown,
- iii) a corporation, commission, board or other body, the majority of the members of which, or the majority of members of the board of directors of which, are appointed under an Act of the province, the Lieutenant-Governor in Council or a minister of the Crown,
- iv) a court established under an Act of the province, and
- v) the House of Assembly and committees of the House of Assembly. (Source: MOIA)

**Record** – A record means a correspondence, memorandum, form, paper, parchment, manuscript, map, plan, drawing, painting, print, photograph, magnetic tape, computer disc, microform, electronically produced document and other documentary material regardless of physical form or characteristic. (Source: MOIA)

**Corporate Record** – A corporate record, often referred to as an administrative record, are those created by all organizations to support administrative functions, including human resources, general administration, facilities management, financial management, information and information technology management, and equipment and supplies (material) management. (Source: CRIMS)

**Government Record** - A government record is a record created by or received by a public body in the conduct of its affairs and includes a Cabinet record, transitory record and an abandoned record. Disposal of a government record must be sanctioned by a records retention and disposal schedule (RRDS) that has been approved by the Government Records Committee (GRC). (Source: MOIA)

**Operational Record** – An operational record is a record that reflects the unique mandate of an organization. Records of programs, projects, and service delivery are examples of operational records. Unlike corporate records, these will be different in each organization. (Source: OCIO)

**Transitory Record** – A transitory record is a government record of temporary usefulness in any format or medium having no ongoing value beyond an immediate and minor transaction or the preparation of a subsequent record. Transitory records can be securely destroyed when no longer of value without authorization of the Government Records Committee. (Source: MOIA)

**Records Retention and Disposal Schedule** – A Records Retention and Disposal Schedule (RRDS) is a disposition authority that supports the lifecycle management of a government record. The Management of Information Act (MOIA), OCIO and the Government Records Committee (GRC) approve two types of RRDS submissions (RRDS for Operational Records and One Time Disposal) for use by departments and other public bodies for the legal retention, transfer and disposal of government records. A RRDS:

- defines the content of the record series or types;
- links the records to the organizational unit and business process;
- dictates how long the records need to be retained in active and semi-active storage to meet operational and legislative requirements; and



— authorizes the disposal of information in a legal manner through secure destruction or transfer to The Rooms Provincial Archives. (Source: OCIO)

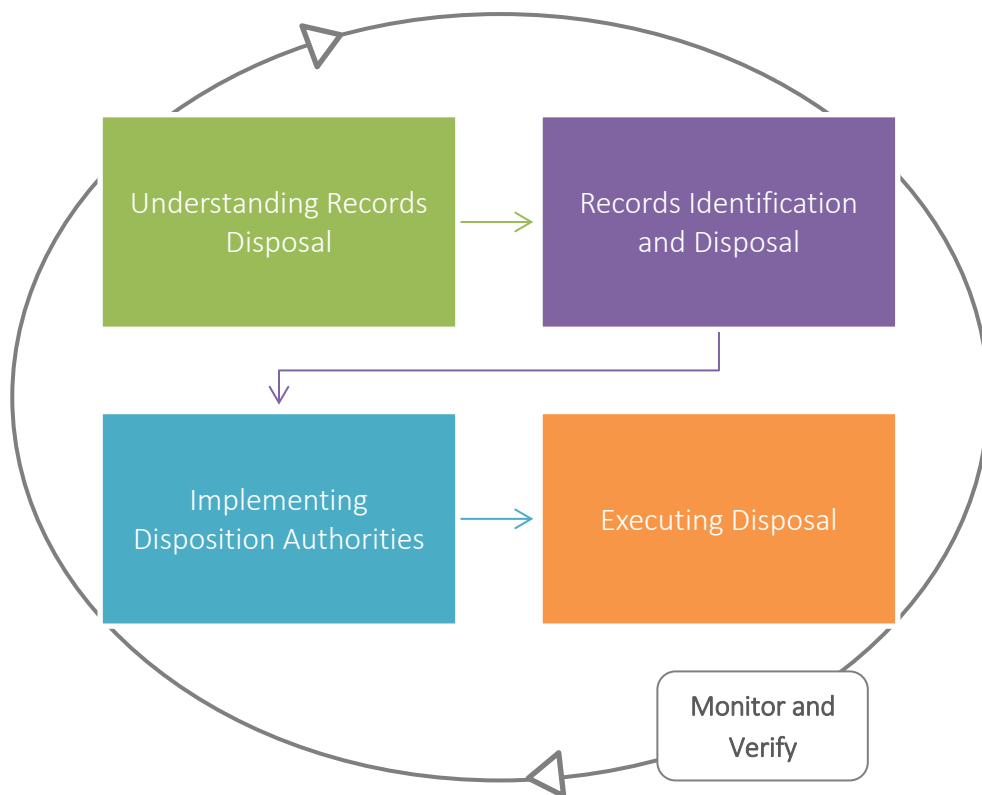
The table below includes common abbreviations used by OCIO as well as acronyms found within this document.

Abbreviation	Description
ATIPP	Access to Information and Protection of Privacy
CRIMS	Corporate Records Information Management Standard
GRC	Government Records Committee
IM	Information Management
IM&P	Information Management and Protection
IP	Information Protection
MOIA	Management of Information Act
OCIO	Office of the Chief Information Officer
OTD	One Time Disposal
PPA	Public Procurement Agency
PRC	Provincial Records Centre
RRDS	Records Retention and Disposal Schedule

## 4.0 Recommended Approach

The intent of this Guideline is to provide recommended actions, general approaches and operational behaviors that when implemented will serve to drive the design, development, implementation and management of an effective IM Program through the development of an IM Performance Management Framework.

After reading this document, a department or other public body should be able to apply the knowledge and have an understanding of the organization’s records disposal requirements.



Graphic: 1 - Recommended Approach

## 4.1 Understanding Records Disposal

Information requires assessment to determine whether it meets the requirements outlined in approved disposition authorities. It is only when these requirements have been met that the appropriate processes are followed to ensure the appropriate level of sign-off prior to the secure disposal of records.

The requirements and processes described in this guideline will assist departments in ensuring that their IM Program securely disposes of government records appropriately.

## 4.2 Records Identification and Disposal

Not all records have the same disposal requirements. Departments and other public bodies must identify and implement appropriate disposal requirements based on record type and the retention needs of the records series.



A record, by broad definition, means that all government information, regardless of media requires management in a secure and efficient manner including, but not limited to:

- Messages (e.g., email, instant messages, etc.) sent and received by individuals working on behalf of a department or other public body.
- Office records including documents (e.g., Microsoft Word, Google Docs, etc.), presentations (e.g., Microsoft PowerPoint, Google Slides, etc.), spreadsheets (Microsoft Excel, Google Sheets, etc.);
- Physical records stored onsite (e.g., workstations, file rooms, etc.);
- Boxes of records in offsite storage locations (e.g., commercial storage, etc.) ; and

- Database records in organizational business applications (e.g., case management systems, etc.).

The following table provides a high-level disposal summary description.

Record	Summary Description
Government	Legal disposal of government records must be completed in accordance with the MOIA and with the approval of a GRC approved disposition authority and secure measures.
Transitory	Transitory records can be securely destroyed when assessed as no longer having operational value. Although authorization by the GRC is not required to dispose of transitory records there is a requirement to assess the information as per the Transitory Records Directive.
Cabinet	Cabinet records are highly confidential records which have specific management requirements that must be adhered to by all departments and other public bodies. As per the MOIA, these requirements are defined by Cabinet Secretariat.
Publicly Released Documents	Publicly released documents include documents published by government departments and other public bodies, and other documents, which are publicly released or tabled in the House of Assembly. Copies are required to be sent to the Legislative Library and should be validated prior to disposal.
Abandoned	Because the true value of abandoned records may initially be unknown, there may be significant effort required to dispose of abandoned records. The OCIO will work with departments and other public bodies on a case-by-case basis to determine an appropriate approach to the disposal of records deemed to be abandoned.
Active versus Semi-Active	An organization may need to retain records for legal and regulatory reasons long after they have fulfilled their operational usefulness. Disposal can only occur through the assessment and application of a disposition authority.

#### 4.2.1 Government Records

The preferred method of disposal is through the ongoing implementation of a disposition authority (e.g., RRDS for Operational Records). Some examples of government records include:

- Completed application forms and receipts;
- Case files, client files, work orders or reports related to providing a service;
- Recommendations and decisions including relevant supporting material such as briefing notes;
- Emails documenting decisions or providing direction for action;
- Deliverables provided to the government by consultants or contractors; and
- Data stored within IT systems used to support operational functions, service delivery and decision-making.

The department or other public body must permanently retain a record of the secure disposal of government records and disposal activities according to the retention periods set out in Corporate Records Information Management Standard (CRIMS) for records related to the Information Management function.

#### 4.2.2 Transitory Records

Departments and other public bodies need to develop an internal process for the assessment and secure disposal of transitory records as part of their overall IM strategy. It is important to note that if transitory records exist and are accessible they must be produced in the event of a legal hold, audit or access to information request. Secure disposal of transitory records as a regular course of business is encouraged to minimize resources required for their storage and management.

Examples of transitory records will be specific to the business processes of the organization. The below list includes some common examples.

- Convenience copies of information retained for reference purposes;

- Copy of a report or a government record available in an alternate location and format;
- Drafts of records which reflect content that is included in the final version of the record, indicate a change in direction, or contain only minor edits to content or formatting changes;
- Supporting information used in the preparation of a subsequent record; and
- Records not directly related to you or your office that do not require you to act.

The secure destruction of transitory records does not need to be recorded by the department or other public body; however, an overall business rule or general approach to the destruction of transitory records should be documented. This organizational guidance must align with OCIO-issued Transitory Records Directive and Guideline. Transitory records may contain personal or confidential information and secure destruction practices are required.

#### **4.2.3 Cabinet Records**

Cabinet records are highly confidential records that have specific management requirements. All departments and other public bodies are required to adhere to all requirements. Questions regarding the management and disposal of cabinet records should be directed to Cabinet Secretariat.

#### **4.2.4 Publicly Released Documents**

The Legislative Library is the official depository for information publicly released by the Government of Newfoundland and Labrador. It is the Library's responsibility to preserve and make accessible these materials for long-term use and historical posterity regardless of their original format or storage medium. Publicly released documents include documents published by government departments and other public bodies, and other documents such as agreements, letters, and press releases, which are publicly released or tabled in the House of Assembly. Additional materials may be acquired at the discretion of the Legislative Librarian.

As per The Rooms Act, copies of publicly released documents must be transferred to the Legislative Library. Departments should make this practice a regular course of business such that a copy is transferred immediately following its release. In the event that publicly

released documents are discovered during the disposal process, departments and other public bodies are advised to verify with the Legislative Library whether copies of these materials have been received by the Library and have been incorporated into the existing collection.

#### **4.2.5 Abandoned Records**

Incidences of abandoned records is rare. Records are usually able to be linked to a government process that can be traced back to the responsible organizational unit. Because the true value of abandoned records may initially be unknown, there may be significant effort required to dispose of abandoned records. The OCIO will work with departments on a case-by-case basis to determine an appropriate approach to the disposal of records deemed to be abandoned. The Rooms will also need to be engaged to address the possibility of archival records.

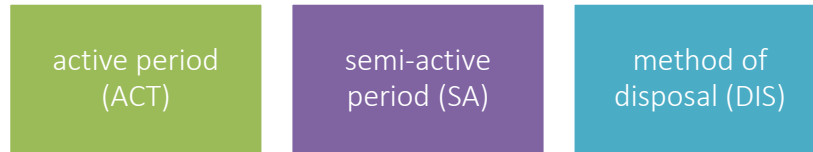
#### **4.2.6 Active versus Semi-Active Records**

Identifying whether records are active or semi-active is important. It is when records cease to be active that the disposition process begins. Active records are consulted frequently to support an organization's operational requirements or business and must be quickly available for reference. Generally, records accessed more than once a month are considered active. All records start out as being active. By organizing active records according to the disposal requirement (e.g., by calendar or fiscal year, project number, etc.), it will be easier to identify and process records that are ready to be securely destroyed or transferred.

Departments and other public bodies are required to create and retain records to support both operational and legal requirements. An organization may need to retain records for legal and regulatory reasons long after they have fulfilled their operational usefulness.

Semi-active records (also sometimes referred to as inactive) are records that do not have to be readily available but which still need to be retained for the possibility of use or reference. Offsite storage, like the Provincial Records Centre (PRC) or third party commercial storage locations provide an alternative for record storage.

Divided into three parts, an approved RRDS for Operational Records helps to ensure that records are transferred offsite when appropriate:



### 4.3 Implementing Disposition Authorities

A disposition authority provides the legal authorization to dispose of a government record. There are two types of disposition authorities, highlighted in the below table, used in the Government of Newfoundland and Labrador. Understanding these disposition authorities, how and when they are used, and exceptions to the disposal process supports the effective and efficient operation of the organization’s IM Program.

Type	Description
Authorities requiring GRC Approval	CRIMS RRDS for Operational Records OTD Submissions
Authorities that do not require GRC Approval	Transfer Decisions Transitory Records

#### 4.3.1 Authorities requiring GRC Approval

The disposal of government records requires the authorization of the GRC. The recommended disposal authority for government records is a RRDS for Operational Records. A RRDS signifies a legal requirement on the part of a department or other public body. Departments and other public bodies may securely dispose of records as per the following GRC approved disposition authorities:

Disposition Authority	Description
CRIMS	CRIMS is the standard used to dispose of government corporate or administrative records. Departments and other public bodies need to ensure they have submitted a request to the GRC to sign on to CRIMS prior to disposing of records using this authority. As organizations re-structure and mandates change they may have to seek approval under the new organizational structure.



Disposition Authority	Description
RRDS for Operational Records	A RRDS for Operations Records is an IM disposition authority used for the management of operational records specific to a department or other public body. Departments and other public bodies are responsible for the development, obtaining approval and implementation of RRDSs for their own operational records. The RRDS can be for all records in an organization, for the records of a specific branch or division or may be limited to specific record types or record series.
OTD Submission	OTD Submission may be used to dispose of a backlog of inactive records but is not meant to be a replacement for the regular and consistent implementation of an approved RRDS for Operational Records. It may be used when records have resulted from an activity no longer in progress (e.g., organizational unit, service or function that no longer exists, or business function or project which was created to suit a specific purpose and had a specific lifespan). The process includes an inventory of the records, the volume of the records in question and the submission of a completed OTD Submission Form to the GRC for approval.

Ongoing implementation of approved disposition authorities ensures appropriate disposal of records when they cease to be of operational or legal value. An approved disposition authority documents disposal and once a department or other public body has GRC approval; it is their responsibility to implement as part of the regular course of business.

Disposal actions are either:

- 1) Destroy - Records that have no operational or legal value to a department or other public body are securely destroyed; or
- 2) Transfer to Archives - Custody of records of enduring historical or cultural value transferred to The Rooms Provincial Archives. The Rooms Provincial Archives will determine whether records created by a department or other public body have enduring value and will work with the organization to arrange the transfer of those records deemed to have such value. Refer to The Rooms Provincial Archives to ensure that appropriate procedures are followed to transfer custody of records.

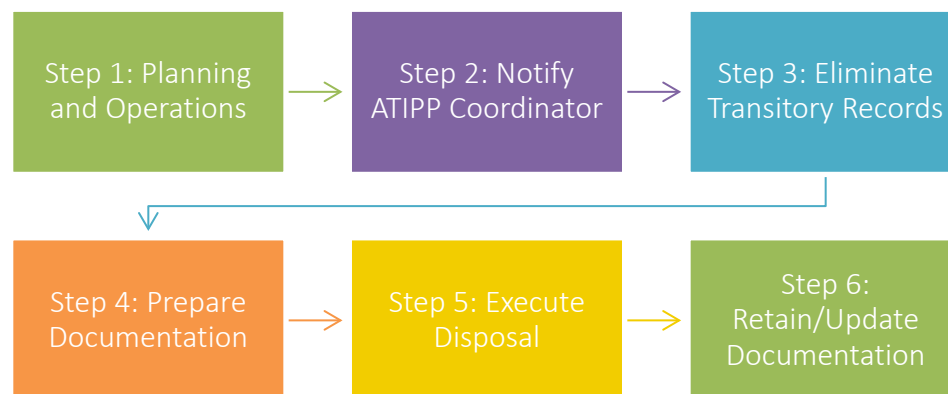
### 4.3.2 Authorities that do not require GRC Approval

Departments and other public bodies may securely dispose of records as per the following disposition authorities that do not require GRC approval:

Disposition Authority	Description
Transfer to Legislative Library	As per The Rooms Act, copies of records produced by a department or other public body for general or limited distribution to the public must be transferred to the Legislative Library. Contact the Legislative Library prior to initiating transfer of materials. The Library will generally accept up to four copies of any one title/item not already in the collection.
Transfer to another entity	Transfer of records to an entity outside of the creating entity (e.g., the move of a business unit into another department or other public body).
Transitory Records:	The management of transitory records through an individual’s regular assessment and secure disposal permits individuals to identify and dispose of records that no longer have value in a department or other public body’s activities and decision-making abilities; promotes the quality of records holdings for future use and ease of access; and supports responsible fiscal use of resources.

### 4.3.3 Disposal Process

Approved secure disposal of records is a key objective of all the tools/activities within an organization’s IM Program. Each department or other public body will need defined business processes to support and demonstrate compliance. Typical steps include:



**Step 1: Planning and Operations**

Planning for records disposal within a department as a part of its ongoing operations is the best way to ensure that disposal occurs in a timely manner. The frequency with which records need to be disposed will vary depending on the nature of a department or other public body's business and the retention periods established by its records retention and disposal schedules. Some departments focus on the end of calendar year, fiscal year, school year, etc. and can close files at that time. Others rely on the completion of programs or services to initiate disposal. Be familiar with the organization's disposition authorities and schedule activities at appropriate intervals to initiate disposal. A records classification plan can be used to organize records according to disposal requirements. This makes it easier to identify and physically prepare records for disposal. Using the disposition authority and other IM tools (e.g., inventory, records classification plan, etc.) identify records that have met their retention requirements and must now be either destroyed or transferred to The Rooms Provincial Archives.

**Step 2: Notify ATIPP Coordinator and Legal Representative**

The organization's ATIPP Coordinator and legal representative will be aware of ongoing legal hold, audit or access to information requests that may require the disposition, including secure disposal or transfer, of records to be placed on hold.

**Step 3: Eliminate Transitory Records**

Secure destruction of any records assessed as transitory records eliminates unnecessary processing (e.g., creating folders, boxing and documenting records to prepare for transfer).

**Step 4: Prepare Documentation**

Whether you are securely destroying records or transferring them to The Rooms Provincial Archives or another entity, sufficient information about the records should be captured to ensure the department or other public body retains a complete inventory of both the information that it holds (Records and Information Inventory) and the information disposed (Documenting Approved Disposition Forms). This includes:

4a: Record Series/File Documentation - The amount of documentation required to ensure accessibility varies depending on the nature of the organization's business. For example, in the case of paper records, a box containing project or claim files may need a detailed file list that includes the name or identifier for each file. Alternatively, a processing centre may be able to put a range of numbers/dates on a box and, because they file sequentially or by date, they are able to track the

content of the box with that amount of information. Departments and other public bodies are advised to develop their own forms that capture appropriate level of information to ensure that the content of the records in question are known. These forms should be consistently used by all individuals responsible for the processing of records.

4b: Transfer documentation - Documents are required to complete the transfer of records to either offsite storage (e.g., Provincial Records Centre) or to The Rooms Provincial Archives.

#### **Step 5: Execute Disposal**

Executing the disposal will vary depending on the nature of the disposal. The various options for secure disposal including detailed requirements/processes are described in the approved disposition authority

#### **Step 6: Retain/Update Documentation**

CRIMS includes requirements for retention and disposal of corporate records related to an organization's IM Program. Following the disposal of information, update any related inventories, classification plans, finding aids, etc. to ensure accessibility of information. Copies of completed transfer lists and certificates of destruction are to be retained as per CRIMS.

### **4.3.4 Variances in the Disposal Process**

Departments and other public bodies are obligated to implement approved disposal authorities. Legitimate variances in the implementation of a disposal authority may occur. For example, disposal of records may need to be put on hold to accommodate legal hold, audit or access to information request. In the event that the regular course of business is interrupted resulting in an inability to dispose of information, the variance as well as the resumption of normal disposal operations should be documented.

## 4.4 Executing Disposal



### 4.4.1 Master Standing Offer Agreements

The Public Procurement Agency (PPA) maintains a number of Master Standing Offer Agreements (MSOA) that support the standard purchase of goods and services related to IM including third party offsite storage and secure shredding services. Contact the staff within your organizations responsible for purchasing to ensure that you are using the appropriate MSOA when procuring IM related services.

### 4.4.2 Secure Destruction

Whether assessed as transitory or a government record that requires a GRC approved disposition authority, destruction should be done in such a manner that information contained within the record is made permanently inaccessible. This may be secure shredding in the case of paper records, or secure erasure or disposal of physical media in the case of electronic records.

### 4.4.3 Paper/ Microforms

There are three options for the secure destruction of paper/microform records:

Option 1: Shredding by Staff
— This option is best suited to the disposal of transitory records or in offices where the content is highly confidential and therefore warrants document level disposal (e.g., cabinet records).
— Onsite shredding is time consuming as the volume that can be processed varies depending on the size and quality of the shredder.

<b>Option 1: Shredding by Staff</b>
— It is important to ensure that the shredder output renders the records irrecoverable.
— If destroying government records per an approved disposition authority a record of the disposal authority, what was destroyed, by whom and when should be retained.
<b>Option 2: Secure Shred Bins (Third Party)</b>
— Secure shred bins with secure covers and locks and may be numbered by the vendor or those responsible for IM to allow for tracking and reporting.
— Secure shred bins are highly recommended for the secure disposal of transitory records as individuals working on behalf of a department or other public body can regularly place materials in a centrally located secure shred bin.
— If used to destroy government records per an approved disposition authority the department or other public body should keep a record of what is placed in the secure shred bin.
— A representative from the department or other public body should accompany the vendor to the loading area to witness the destruction of the records.
— A destruction certificate issued by the vendor to the department or other public body indicating the secure destruction of the contents should be retained. This certificate should be retained by the organization as per CRIMS.
<b>Option 3: Bulk Shredding (Third Party)</b>
— In the event that there is a large volume of records to be securely disposed (e.g., implementation of an RRDS for Operational Records) a third party may be contracted to complete the process.
— Records are boxed by the department or other public body with records (e.g., file lists) of their contents retained for reporting purposes.
— Boxes are taken by the vendor offsite for destruction. The department or other public body should always witness destruction.
— Vendor should return a destruction certificate to the department. The certificate should be retained by the organization as per CRIMS.

#### **4.4.4 Electronic Records on the Shared / Network Drive**

When records are deleted from the network drive by individuals working on behalf of the organization, they are typically inaccessible to users of the shared or network drive. Departments and other public bodies are advised to ensure that appropriate documentation occurs in the event that government records are deleted from the shared or network drive.

#### **4.4.5 Electronic Data**

Electronic data retained within business applications may constitute a government record. While the OCIO is the custodian of this data, for business applications supported by the OCIO, the department or other public body is the owner of the information and is responsible for providing the OCIO with proper direction on the retention and disposal requirements related to data within a business application. Departments and other public bodies are also responsible for developing disposition authorities for approval by the GRC to authorize the disposal of data maintained within business applications. The OCIO will work with the department or other public body to ensure implementation of approved disposition authorities for this data including reporting requirements related to the secure disposal.

#### **4.4.6 Transfer of Records**

Transfer of records could include transferring information to The Rooms Provincial Archives and/or transfer of records to an entity outside of the creating entity (e.g., the move of a business unit into another department or other public body). This transfer should follow secure processes and include clear and accurate documentation.

### **4.5 Monitor and Verify**

A review and validation of an organization's record disposal processes including development and implementation of disposition authorities are the mechanisms for monitoring and verifying IM. The disposition components and supports need to be lifecycle managed to ensure they are providing accurate and relevant information to the organization. These elements should also be assessed to validate that they continue to support an accurate reflection of the organization's disposition requirements.

## 5.0 Roles and Responsibilities

### Deputy Minister or Permanent Head or Designate

#### (Department or other Public Body)

- Support the department or other public body's compliance with MOIA as well as OCIO-issued policies, directives, standards and guidelines, and ensure that proper protocols are in place to properly develop and manage a records and information management system, often referred to as an IM Program.
- Support the development, maintenance and continual implementation of records disposal in the organization's IM Program.

### Directors responsible for IM

- Align organization-issued materials with the guidance provided by the OCIO in the development and implementation of records disposal within the organization's IM Program.
- Apply a continual improvement approach to the management of the organization's IM Program to ensure the review and implementation of records disposal.

### Office of the Chief Information Officer

As part of OCIO's administration of the MOIA, the OCIO:

- Recommends to Treasury Board policies for adoption.
- Develops, manages, monitors, and communicates IM&P policy instruments and supporting materials to departments and other public bodies.
- Provides direction on IM&P best practices, resource requirements, organizational structure, recordkeeping systems and IM Programs to departments and other public bodies.
- Assists departments and other public bodies to improve their IM&P capacity.
- Provides IM&P advisory, training and awareness services and support to departments and other public bodies.
- Supports IM forums, committees, and other professional practice communities, consisting of IM representatives from departments and other public bodies.
- Manages the Provincial Records Centre (PRC).
- Provides administrative support to the Government Records Committee (GRC).

In addition, the OCIO will:

- Develop, implement and maintain this Guideline as well as the GuideBook, also known as the Guide to IM for Public Bodies.
- Provide education and awareness on the implementation of Records Disposal.



## 6.0 Supporting Materials and Version History

### Supporting Materials

Below is a listing of supporting materials hyperlinked to the published location.

Management of Information Act

<http://www.assembly.nl.ca/Legislation/sr/statutes/m01-01.htm>

Policy - Information Management and Protection

<https://www.gov.nl.ca/exec/ocio/im/policy-instruments/im-ip-policy/>

Access to Information and Protection of Privacy Act, 2015

<http://www.assembly.nl.ca/Legislation/sr/statutes/a01-2.htm>

Rooms Act

<https://assembly.nl.ca/legislation/sr/statutes/r15-1.htm>

Directive - Disposition

<https://www.gov.nl.ca/exec/ocio/im/policy-instruments/disposition/>

Directive – Transitory Records

<https://www.gov.nl.ca/exec/ocio/im/policy-instruments/transitory-records/>

Corporate Records Information Management Standard (CRIMS)

<https://www.gov.nl.ca/exec/ocio/im/crims>

<https://www.gov.nl.ca/exec/ocio/files/im-transferring-records-to-the-rooms-provincial-archives-v1-r4.pdf>

<https://www.gov.nl.ca/exec/ocio/files/fyi-im-advisory-transferring-records-to-prc.pdf>

OCIO Website

<https://www.gov.nl.ca/exec/ocio>

### Version History

The following table highlights the version history of this document including date issued and version number.

Date (yyyy-mm-dd)	Version
2011-06-15	1.0
2015-03-23	2.0
2022-05-06	3.0

## Appendices

Appendices listed below directly relate to the Guideline IM Education and Awareness for Employees and are published independent of this Guideline on the OCIO website, <https://www.gov.nl.ca/exec/ocio/im/practitioners/chart/>.

Appendix	Title
A	Checklist- Disposal of Records
B	Quick Reference - Records and Information Management System
C	Form - Documenting Approved Disposition

### Other GuideBook References:

IM Performance Management

Information Protection