



Nunavut Tunngavik Inc.

RECORDS MANAGEMENT POLICY

Approved by the Board of Directors in October, 2012

I. PURPOSE

The purpose of this Policy is to establish and maintain a record-keeping system and practice at NTI that:

- ensures responsible management of NTI records and record-keeping systems as valuable resources and assets;
- ensures control over the creation, maintenance and disposal of NTI's records;
- ensures that record-keeping and retention practice at NTI is consistent with regulatory and legal requirements; and
- ensures the availability of and access to accurate and reliable records.

II. DEFINITIONS

2.1 For the purpose of this Policy,

“Record(s)” means any information, material or document, regardless of medium or form, which is related to NTI, including both non-electronic and electronic information (including electronic mails) as well as any metadata of electronic documents.

“Records Management” means the practice of maintaining and managing the Records of NTI from the time of their creation to their eventual disposal, including without limitation the classifying, storing, securing, destruction and archiving of the Records.

“Records Information Management System (RIM)” means a records management system implemented by NTI for the purposes of managing NTI Records in electronic or internet-based format.

“Convenient Record(s)” means a copy of a Record that is made for convenient purposes (e.g. a paper printout of an electronic document), and that is additional to the original or source copy.

“Records Destruction” means permanent deletion of a Record from the RIM and destruction of all other formats (e.g. paper) of that Record. Records Destruction does not

include destruction of paper-based records under Section 4.2(a) or deletion of a Convenient Record.

“Personal Information” means any information about an identifiable individual (e.g. date of birth, social insurance number, marital status, medical, criminal or employment history of an individual (including but not limited to NTI members, directors and employees) that NTI collects in the course of its business and that are required to be safeguarded under applicable law.

“Non-Records Material” means any piece of information or document that does not provide information about or is not related to NTI, which includes a Convenient Record, or any information or document that is personal in nature and is not collected by NTI staff for business purposes.

2.2 For the purpose of this Policy, NTI Records include the records of organizations that are managed by NTI.

III. APPLICATION

All NTI Records shall be managed under this Policy. This Policy applies to NTI Membership (including any committees), Board of Directors (including any committees), and all staff. This Policy also applies to organizations whose records are under the care and control of NTI.

IV. RECORDS MANAGEMENT

4.1 Use of Records Information Management System (RIM)

- (a) All Records shall be stored and maintained in the RIM. The source version of any Record shall not be saved outside the RIM unless a user is outside the office.
- (b) If a user is outside the office and has created or stored Records outside the RIM, he or she shall promptly transfer the Records to the RIM after returning to the office.
- (c) During a transitional period before the RIM is fully operational in some of NTI's offices, the Director of Communications may permit alternative practice to Subsections (a) and (b).

4.2 Paperless Record

- (a) For efficiency, NTI is striving to achieve a paperless record-keeping system except when the maintenance of an original paper-based record is necessary (e.g. an original document with historical or legal value). Paper-based records are any records that are written or printed on paper such as hand-written notes, correspondence, printed reports, procedures, briefing notes, or maps, etc.

- (b) For any Records that have been properly stored in electronic formats in the RIM, any other electronic or paper-based version (including Convenient Records) may be deleted or destroyed immediately.

4.3 Collection and Protection of Personal Information

- (a) NTI officers and employees may collect and store Personal Information only to the extent necessary to carry out NTI's business. All Personal Information that are not or no longer required for NTI's business or by the applicable law shall be deleted and destroyed as soon as practicable.
- (b) All Personal Information shall be stored and safeguarded in a secure manner (e.g. in a password-protected area in the RIM).
- (c) Except as allowed by the law, no persons may disclose to or share with any third parties Personal Information without consent of the individual.

4.4 Records Destruction

- (a) Except as provided in this Policy, Records Destruction shall only be carried out based on retention schedules approved by the Record Manager. A retention schedule, also known as a "File Plan," describes a set of pre-determined individual retention rules.
- (b) Records Destruction shall be properly recorded and supervised by the Records Manager.

4.5 Suspension of Records Destruction during Litigation

- (a) All Records Destruction shall be immediately suspended when NTI has notice of a real or potential legal or regulatory action against NTI. The destruction shall be resumed, in whole or in part, only after the legal action is concluded or following instructions of legal counsel.

V. ROLES AND RESPONSIBILITIES

5.1 Records Manager and Legal Division

The Records Manager, under the direction of the Director of Communications and in consultation with the Legal Division, is charged with the overall responsibilities for managing, standardizing, improving, coordinating and monitoring records and information management within NTI.

5.2 Departments/Divisions

- (a) Each department is responsible for identifying, classifying and managing its Records to meet its operational and administrative needs.

- (b) Each department's director and administrator, with the assistance of the Record Manager, are responsible for the maintenance and organization of the department's site in the RIM.

5.3 Monitoring

- (a) The Records Manager is responsible for monitoring the records management practice of NTI including the consistency of use of the RIM.
- (b) The Records Manager shall conduct regular record management audit of each department's records management practice annually to ensure that this Policy is properly followed. Departments and staff are required to fully cooperate with the Records Manager during the audit.
- (c) The Record Manager may take reasonable measures to correct non-compliance of NTI's record management policies and practices, and to report the non-compliance to appropriate supervisors if necessary.

(Approved in October 2012)