

<b>Administration</b>	<b>Corporate</b>	<b>Board Approved Date:</b>	<b>21-02-24</b>
<b>Policy</b>	<b>Records Management</b>	<b>Revision Date:</b>	<b>N/A</b>
<b>Policy No.</b>	<b>20-081</b>	<b>Internally Approved Date:</b>	<b>21-02-12</b>
References	Personal Information Protection and Electronic Documents Act, 2000 Municipal Freedom of Information and Protection of Privacy Act Housing Services Act, 2011 Ontario Regulation 367/11 [Not-for-Profit Corporation Act, 2010 Security Policy Internal Controls Policy Privacy and Confidentiality Policy		
Forms	Tenant File Structure Corporate File Structure Sample Project Files and Records		

### 1. Policy Statement

Designated staff will maintain the tenant, corporate, financial and other records of DRNPHC in the manner prescribed in this policy. Documents and records will be kept securely and for the periods prescribed by legislation. All documents and records containing personal, confidential, or sensitive information will be destroyed prior to disposal upon expiration of legislated retention periods.

### 2. Purpose

The purpose of this policy is to assign responsibility for record management, security, and retention and to standardize the storage of information in order to facilitate easy access to vital information by authorized parties such as staff, the board of directors, auditors, and representatives of the service manager or governments having jurisdiction.

### 3. Scope

This policy applies to all staff who work with tenant, corporate, financial and other records.

### 4. Definitions

Designated staff

The staff person(s) or department designated to complete a particular action or requirement.

Personal information

- an individual's personal address, telephone number, or email address
- any identifying number assigned to an individual which can lead to their identification (e.g. Social Insurance Number)
- an individual's income and assets
- bank account and credit card information
- rent payment history
- the race, national or ethnic origin, citizenship status, colour, religion, age, sex, sexual orientation, marital or family status of an individual
- education, medical, psychiatric, psychological, criminal or employment history of the individual
- credit and rental history reports
- financial information for the purposes of establishing rent-geared-to-income

assistance

- an individual's blood type or fingerprints
- information about an individual's personal or political opinions
- correspondence sent to DRNPHC that is of a private or confidential nature, and any replies from DRNPHC that would reveal contents of the original correspondence
- the individual's name if it appears with other confidential information (e.g. rental arrears reports)
- employee information including résumés, salary and benefits, disciplinary action, bank account information, tenant complaints about the individual, and problems between staff

Sensitive information

Any financial, corporate, or legal information related to DRNPHC, its activities, and its interests.

## 5. Procedure

### a) Record and document management

Tenant file structure (paper)

Tenant files will be organized in accordance with the *Tenant File Structure* and will be maintained by designated staff.

Active tenant files will be stored in a locked file room in accordance with DRNPHC's *Security Policy*.

Tenant Site Files (paper)

DRNPHC will retain a file on site for each tenant containing emergency contact information, notice of entry and similar site documentation. When the tenancy ends these files will be returned to the main office for inclusion with the main tenant file.

Corporate filing structure (paper)

Corporate and financial records, operational information, property maintenance information, contracts and other documents will be filed in accordance with *Corporate File Structure* and will be maintained by designated staff.

Active files will be stored in the head office file room or in locked file cabinets in the appropriate department in accordance with DRNPHC's *Security Policy*.

Electronic files and records

Electronic files and records are stored on a main server located at DRNPHC's head office. A series of drives are available for employees to store their data and files; however, staff are directed to use the J drive for this. Various folders are organized on the J drive that



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represents the key departments, areas of the business, and key initiatives. Staff are required to save their electronic documents to these folders and drive.

Designated staff or an external contracted service will create back-up copies of all electronic records and files on a daily basis. Back-up copies are automatically made using 'Datto Service' cloud technology.

### Inactive files and documents

Tenant files will be declared inactive five years after the tenant moves out of DRNPHC

Financial records (including RGI Calculations for former RGI tenants) will be declared inactive seven years after the end of the fiscal year to which they relate.

Corporate and other files and documents may be declared inactive if the information contained within the file or document is no longer applicable.

Designated staff will store inactive files in either the Wood Farm Manor File Storage Room or with an external file storage company.

### b) Removal of records

Paper and electronic records that contain personal or sensitive information will not be removed from DRNPHC's premises without the written consent of designated staff. These records must be properly secured and may not be left unattended while off the premises of DRNPHC.

Staff permitted to remove records from the premises of DRNPHC will take the following steps to ensure the security of the information and the privacy of individuals and/or DRNPHC.

Electronic files will be password encoded.

Paper files will be stored in a secure location (note: locked vehicles are not considered to be a "secure location").

Files, regardless of type, will not be shared with or distributed to unauthorized individuals, groups, or organizations.

### c) Document and file retention

#### Paper documents and records

All inactive documents and files will be retained for seven years from the date that they were declared inactive.

All inactive documents and files will be stored in either the Wood Farm Manor File Storage Room or with an external file storage company.

Files and documents will be retained for different periods of time from the date they were declared inactive based on the type of information contained within them. Inactive files will be moved to the storage location on an annual basis by designated staff or sooner if so determined by the designated staff.

Retention period	Type of information/document
indefinite	<ul style="list-style-type: none"> <li>• articles of incorporation</li> <li>• signed minutes from board of directors and members meetings</li> <li>• letters patent</li> <li>• registers of current and former directors and officers</li> <li>• operating agreement, construction contract, ground lease, contract with a development consultant or architect or any title document relating to the development or construction of the housing project.</li> <li>• drawings, plans and technical specifications</li> <li>• corporate bylaws</li> </ul>
until revised	<ul style="list-style-type: none"> <li>• board-approved policies</li> </ul>
7 years	<ul style="list-style-type: none"> <li>• financial information (<i>seven years after the end of the fiscal year to which it relates e.g., income tax returns, accounts payable/receivable</i>)</li> <li>• records of decisions to refuse to offer a unit to an applicant (<i>seven years after applicant receives notice</i>)</li> <li>• contracts (<i>seven years after the agreement has been terminated or expires e.g. service contracts, partnership agreements</i>)</li> </ul>
7 years	<ul style="list-style-type: none"> <li>• minimum retention period for files of former RGI households</li> </ul>

Electronic documents and records

Back-up copies of electronic information will be stored indefinitely. Back-ups of electronic information will be stored off site in the cloud by an external contractor and will be updated on a daily basis.

d) Destruction of files and documents

Paper files and documents

Documents and files that contain personal and/or sensitive information and that are no longer required by legislation to be retained by the corporation shall be destroyed on an annual basis.

Designated staff will be responsible for the destruction and disposal of documents and files. All documents will be shredded by an external contractor.

Destroyed paper documents and files will be recycled where appropriate.

e) Electronic files

Designated staff will utilize the necessary measures such as disk encryption to securely delete inactive electronic files on all active computers on an annual basis. Third party software or drive scrubbers will be used when the hard drive is being recycled or donated.

f) Electronic devices

All portable electronic devices, which may contain personal or sensitive information and which cannot be reused in a manner that safely removes that information will be irreparably destroyed. This includes CDs, disks, back up disks, and other similar technologies.

Flash drives and other reusable electronic devices will be inspected on an annual basis and the contents deleted using third party software.

Computer hard drives will be destroyed (holes drilled through the device) when central processing units are being disposed of (not recycled or donated) in order to prevent any latent files from being recovered by unauthorized individuals.

g) Record of destruction

A record of what files and/or devices were destroyed, the method of destruction and the date items were destroyed, will be maintained by designated staff and kept on file for easy reference.

next of kin claim property that has been disposed of, DRNPHC will pay the estate the difference between the proceeds of the sale of the property and DRNPHC's out-of-pocket expenses related to the moving, storing, securing, and selling of the property, as well as any arrears of rent.

End.