KWANTLEN POLYTECHNIC UNIVERSITY

Policy History
Policy No. IM10
Approving Jurisdiction: President
Administrative Responsibility: President
Effective Date: January 1, 2026

Records and Information Management (RIM) Policy

A. CONTEXT AND PURPOSE

Records and Information Management (RIM) is at the centre of Information Governance (IG), working together with Organizational Risk Management, Information Access and Privacy, Legal, Information Technology and Information Security, in support of Kwantlen Polytechnic University's (University) vision and mission, while balancing the operational needs of Academic and Service Units to effectively operate on behalf of the University. The primary focus of this policy is to address the Records and Information Management practice at the University, and convey to Employees and Non-employees that they are:

1. Responsible for the efficient, effective, and systematic management of Information Assets;

2. Accountable for the creation, receipt, maintenance, use and Disposition of those Information Assets; and,

3. Responsible for complying with provincial, federal, and international legislation, regulations, and standards, along with this policy, related procedures, guidelines, and best practices that ensure confidentiality, integrity, and availability of the University's Information Assets throughout the Information Lifecycle.

B. SCOPE AND LIMITS

1. This policy applies to all Information Assets, regardless of Format, Medium (e.g. paper, digital, or photographic), location, or device, which are created, received, and maintained in pursuance of the University's legal obligations or normal course of operations.

2. This policy applies to all Employees and Non-employees.

3. Information Assets, such as research, scholarship, or artistic endeavours produced by Faculty, teaching or research assistants employed by the University, or other persons engaged in teaching or carrying out research at the University, that are identified under another authority, may be excluded from this policy.

4. Information Assets pertaining to Indigenous research and data may be governed by alternate protocols and agreements with Indigenous Nations or communities setting out different or additional records management commitments, including with respect to possession, access and control, that may exclude those Information Assets from this policy.

5. This policy, and its related procedures and guidelines, are the authoritative source for Records and Information Management requirements arising from legislative, regulatory, fiscal, or administrative obligations, unless otherwise stipulated (e.g. collective agreement). Therefore, where RIM requirements articulated elsewhere conflict with this policy, and not otherwise stipulated to, the Employee(s), or their designate(s), with administrative responsibility for the respective policies are responsible for resolving the conflict.

C. STATEMENT OF POLICY PRINCIPLES

The Records and Information Management practice at the University is guided by core values and fundamental guidelines as outlined in the following principles to ensure the confidentiality, Integrity, and Availability of Information Assets.

1. Information as an asset

    a. Information that forms a Record is an Information Asset. As such, Information Assets must be protected through responsible, systematic management of the Information Asset identifying its legal, regulatory, financial, administrative, and historical value. Appropriate preservation methods must be utilized to protect Information Assets deemed to have permanent value.

2. Accountability

    a. The President is responsible for the establishment and maintenance of a robust Information Governance model that ensures the efficient, effective, and systematic management of Information Assets. Specific operational duties to achieve this objective may be assigned to one or more Employees and Academic and Service Units including the Manager, Records and Information Management, a RIM working group or committee, a RIM Community of Practice, and others assigned with records coordination responsibilities. Collectively, those

responsible will work collaboratively to ensure strong stewardship of the RIM Program and practice.

3. Transparency in process

    a. Business and information management processes related to Records and Information Management will be documented, verifiable, and made available and open to authorized Employees and other authorized parties. This will facilitate ease of Access for requests for Information while providing for defensible disclosure of Information.

4. Integrity of Information

    a. Information Assets must be reliable and authentic, and considered complete. To demonstrate the Integrity of an Information Asset, the University should protect an Information Asset's Chain of Custody, promote systems integrations that identify and secure Records, document and maintain relevant Metadata and event history related to the Record throughout the Information Lifecycle, and periodically review these processes to identify gaps and make necessary improvements.

5. Protecting Access to Information

    a. Employees and Non-employees are responsible for identifying Information Assets based on their sensitivity and value as identified in the Records Retention Schedule and other policies as listed in Related Policies and Legislation.

    b. The University is responsible for ensuring adequate measures are taken to protect Information Assets, based on their sensitivity and value; as well as against inadvertent or deliberate unauthorized Access, use, disclosure, alteration, and disposal, while balancing an individual's or entity's right to Access Information about themselves.

    c. The University will also ensure to adequately protect Information Assets required to support university operations in the event of a disaster, or a loss, so mission-critical Information Assets remain accessible and retrievable by those authorized to access them when needed.

6. Compliance with laws and regulations

    a. Compliance in Records and Information Management at the University entails the adherence to legal, regulatory, and institutional policies governing the Information Lifecycle, from creation to Disposition. This responsibility typically involves collaboration between administrative leadership, information

technology departments, and designated records management professionals to ensure policies are implemented, followed, and periodically reviewed for effectiveness, ensuring the confidentiality, Integrity, and Availability of the University's Records.

7. Availability

    a. The University will use reasonable efforts to ensure the Availability of its Information Assets to those authorized to access them by ensuring their timely, efficient, and accurate retrieval. This may include, but is not limited to, the application of best practices and guidelines that support the findability and accessibility of Information Assets through standardized naming conventions, file plans, and Metadata tagging.

    b. RIM will aim to provide alternative means to access Records-related Information, resources, and guidance to promote accessibility to Information Assets.

8. Retention of Information Assets

    a. The University is responsible for ensuring adequate and reasonable retention of Information Assets deemed to have legal, regulatory, fiscal, administrative and historical value in documenting the University's legal obligations and normal course of operations.

    b. Authority for the retention of Information Assets is documented in a Records Retention Schedule. RIM is responsible for the creation and maintenance of the Records Retention Schedule, while the President is responsible for approving the Records Retention Schedule. The retention of Information Assets should be reviewed at regular intervals.

9. Disposition of Information Assets

    a. Information Assets will be assessed for their permanent or enduring value and retained.

    b. Subject to applicable laws, Information Assets that no longer provide value to the University will be destroyed in a timely and appropriate manner that ensures the Information is irretrievable. A Disposition plan will be included in a Records Retention Schedule that outlines requirements necessary to protect personal information, ensure compliance with stated requirements, and mitigate risk from inadvertent or unauthorized Destruction.

    c. When Information Assets are identified as responsive to potential or actual litigation, an investigation, an audit, or information query, the retention and disposition plan for those Information Assets will be suspended, and the

Information Assets will be held, until such time as the matter is resolved. Once the matter is resolved, the retention and disposition plan for the Information Assets will continue from the point in time it was suspended.

10. Functional Applications

    a. Custody or Control of Information Assets

        i. Information Assets identified and declared as records which are in the custody or under the control of the University shall be preserved as documented in the Records Retention Schedule unless otherwise set out in this policy or in applicable legislation.

    b. Obligations

        i. Employees are expected to complete RIM training upon beginning and throughout their engagement with the University.

        ii. Should Employees transfer from one Academic or Service Unit to another, they must ensure all Information Assets they were responsible for are available to and remain with the Academic or Service Unit.

        iii. Employees, when leaving employment with the University, must ensure all Information Assets they were responsible for are available to and remain with the Academic or Service Unit.

    c. Technology

        i. The use of technology in support of the RIM Program should promote the efficient and consistent management of Information Assets. This may be achieved through using one or more records management applications or existing RIM functionality and capability within current or new technology applications.

    d. Archival information

        i. The University Archivist will provide advice and guidance in the development and maintenance of the Records Retention Schedule to identify Records Series that may have permanent value to the University and facilitate the transfer to the Archives for further Appraisal where necessary.

        ii. Information Assets that have been identified in the Records Retention Schedule as having permanent value to the University will be assessed to determine where they should be stored providing appropriate Access to both the University and the broader community. Academic and Service

Units will work in collaboration with the University Archivist to determine if the Information Assets shall remain with the Academic or Service Units for permanent retention or be transferred to the University's archives.

e. Risk

i. Information Assets must be managed to mitigate potential risk to the University. This should include identifying potential administrative, legal or regulatory, or technology risks, as well as risks that may arise through the control of Information Assets; establishing control to mitigate or alleviate the potential for risks; monitoring and assessing compliance with risk controls; and responding to and correcting any issues that arise.

11. Regulatory Framework

a. Due to the breadth and depth of activities conducted on behalf of the University, the creation, receipt, maintenance, use, and Disposition of Information Assets are guided by and informed by applicable laws, regulations, industry standards, and best practices as provided for in provincial, federal, and international jurisdictions. Where relevant, the laws, regulations, industry standards and best practices will be documented and maintained in the Records Retention Schedule. The citations included in the Records Retention Schedule will be regularly reviewed and updated when necessary.

D. DEFINITIONS

Refer to Section A of IM10 Records and Information Management (RIM) Procedure for a list of definitions in support of this policy.

E. RELATED POLICIES & LEGISLATION

BP5 Use of University Property
IM2 Freedom of Information
IM3 Information and Educational Technology Usage
IM4 Confidentiality
IM8 Privacy
IM9 Information Security
Employee Code of Conduct
Freedom of Information and Protection of Privacy Act (FIPPA)

F. RELATED PROCEDURES

IM10 Records and Information Management Procedure