



SOCIAL HOUSING POLICIES



DIVISION:	Social and Community Services		
POLICY SECTION:	Social Housing	EFFECTIVE DATE:	12/3/2018
SUBJECT:	Records Management Policy		
POLICY NUMBER:	2018-NP-01	SUPERCEDES:	None

1. PURPOSE

1.1 This policy is intended for use by all County of Simcoe housing providers that operate a designated housing project under the Housing Services Act Rent Supplement (including former OCHAP/CSHP) and the Centralized Waitlist.

- Municipal & Private Non-Profit
- Co-Operatives
- Federal Non-Profit

- Rent Supplement *
**including former OCHAP/CSHP*
- CWL
- Simcoe County Housing

1.2 This policy is intended to outline provisions for the management of records and information within each housing portfolio within the County of Simcoe to ensure efficiency and effectiveness as it relates to the creation, maintenance, retrieval, storage and disposition of records.

2. POLICY STATEMENT

2.1 The County of Simcoe in its capacity as Service Manager is required to establish, as appropriate, policies and procedures to ensure that official housing records are managed in accordance with applicable legislation and regulations, as well as, this policy and any other relevant directives, information bulletins and/or policies.

3. REFERENCES

Housing Services Act, 2011, s. 79 – 81, 169 - 176
O. Reg.367/11, s. 102 – 103, 145 - 147

4. SCOPE

4.1 By following the procedures outlined below, housing providers will implement efficient and cost effective management, preservation and destruction of all records. Further, housing providers will establish the ability to organize, retrieve, provide timely access and responsibly dispose of records, which is fundamental to the application of sound records management practices.

4.2 Definitions:

“Active Records” are those records that are referred to on a daily, monthly or annual basis, to support business processes.

“Destruction” is the physical disposal of records by means of burning, pulping, shredding, disintegration and the electronic disposal of data by means of deletion and overwriting.

“Inactive Record” refers to those records that have low reference activity, usually less than once per month, but preserved until its retention period has been fulfilled. Such records are typically housed in a secure inactive records storage location.

“Records Coordinator” means the Records Coordinator as designated by the housing provider.

“Records Retention Schedule” is a comprehensive schedule setting out the periods for which the official records are to be retained. Such a schedule will include the timing for the transfer of records from active to inactive status, as well as, time periods for the final destruction.

“Retention Period” is the period of time which records must be kept before they may be disposed of. It is usually stated in months or years and may also be contingent upon the occurrence of an event (e.g. tenancy termination).

5. PROCEDURES

5.1. All Housing providers must:

- a) demonstrate compliance with this policy;
- b) report any violation of this policy to their superior and/or the Service Manager, as deemed necessary;
- c) create, classify and store official records in accordance with sound records management processes;
- d) adhere to the retention periods stipulated within the Housing Services Act and its regulations, as well as, Service Manager’s directives and policies;
- e) ensure that disposal of records is carried out in accordance with this policy, and the Organizations destruction procedures;
- f) ensure that records under their custody and control are protected from inadvertent loss or destruction and properly preserved throughout their life cycle;
- g) protect records from unauthorized use or access as prescribed in accordance with this policy and all applicable legislation and regulations;
- h) ensure that all records created are accessible to the Service Manager;
- i) provide evidence of paper and electronic file destruction, annually at minimum

5.2. Records Coordinator, shall:

- a) develop and administer the organizations Records Management Program in accordance with industry best practices, as well as, legislative and regulatory requirements, this policy and any other pertinent directives and/or policies;
- b) ensure that reasonable measures are established, documented and implemented enabling the housing provider to properly manage and protect its records from inadvertent destruction or damage, taking into account the financial and staff resources available to protect such records;
- c) develop and communicate processes which enable departments/staff to maintain compliance with the organization's records management policy, as well as, this policy;
- d) provide records management training to employees;
- e) provide information about inactive storage location and retrieval services to the Program Supervisor;
- f) ensure the preservation, security and timely disposition of official records, being maintained in the inactive storage location, in accordance with the organization's Records Management Program, industry best practices, as well as, legislative and regulatory requirements, this policy and any other pertinent directives and/or policies
- g) from time to time update and administer other elements of the Records Management Program, as necessary

5.3. All official records regardless of format or media, are to be retained for the periods stipulated in the Housing Services Act and its regulations.

5.4. The destruction, deletion, alteration or any attempt to discard or interfere with the accessibility of any official record or other information which may be relevant and required for ongoing, imminent or pending audit, investigation, and litigation, or through an access request under freedom of information legislation, is strictly prohibited.

5.5. Storage:

1. Official records within the custody and control of the housing provider are to remain accessible and retrievable during the retention period.
2. All official records are to be stored in accordance with the records retention system set out by the housing provider.
3. All official records are to be stored in an environment which provides for the preservation of the record over its entire life cycle. The type of storage and services required shall be dictated by the purpose, physical form, use and value of the official record. Care over privacy must be considered, typically seen in the form of locked and fire-proof cabinetry.
4. The electronic mail (e-mail) systems are not an official records repository and are not to be used for the storage of official records.
5. E-mails deemed official records shall be classified in accordance with the records retention system set out by the housing provider.

5.6. Destruction:

1. The housing provider's inactive records are managed in accordance with all applicable legislation.
2. The housing provider has established protocols for the timely and efficient destruction of inactive corporate records pursuant to the housing provider's records retention processes.
3. Upon fulfillment of the retention requirements pursuant to the records retention requirements, official records are eligible for destruction.

4. Destruction/disposal of all official records will be administered by the Records Coordinator.
5. The housing provider must keep a permanent record of all records destroyed and the timing of their destruction. Further, annually provide evidence of record and destruction to the Service Manager.

5.7 Official Records:

1. No official records are to be deleted or otherwise destroyed by any person without the written approval of the Department Head and/or Records Coordinator and without first ensuring that the retention period for the record has been fulfilled and such records have been documented in accordance with the housing provider's disposal procedures.
2. Wherever possible, official records are to be destroyed as part of an annual bulk disposal process, as opposed to being random shredding.
3. Official records, as well as, drafts and copies, are to be destroyed in a manner which preserves the confidentiality of the information contained within.
4. Written confirmation of all destroyed official records, pursuant to the records retention process, shall be maintained by the Records Coordinator.
5. Destruction of official electronic records is to be carried out in accordance with this policy and the industry standard destructions.

5.8 Destruction Record:

Prior to destruction of an inactive file, the following documentation is to be completed:

1. A written description (to the extent that such information is available) of the following:
 - a) the title of the record;
 - b) a brief description of the record;
 - c) a listing of the contents/information being destroyed;
 - d) the written approval of the respective Department Head and/or the Records Coordinator
2. A copy of the record of destruction is sent to the Service Manager

Destruction records shall be retained permanently by the housing provider for audit trail purposes.

5.9 Contact your Program Supervisor with any questions or concerns.