
Heritage College Administrative Procedure #3 Relating to the Management of Private Records

Subject: Procedures relating to the management and control of private records at Heritage College.

Administering Service: Director General's office.

Adopted: June 8, 1999.

Revised: June 20, 2006.

Purpose: The purpose of this document is to provide standard procedures for the management of the private records of the College and to familiarize staff members responsible for records management within their services with the basic requirements of private records control.

Application: These procedures apply to all College records containing information to which the right of access is either restricted or prohibited under the provisions of the *Law on the Access to Documents held by Public Bodies and the Protection of Personal Information*.¹

Procedures²: **1. Identification and Designation of Private Records**

In accordance with article 4.2 of *Heritage College Policy #22* on Archives Management, the administrator responsible for each originating service appraises that service's records for the purpose of identifying dossiers which are to be considered private³.

Dossiers identified as private will be clearly marked with the designation "PRI" on the folder tab and kept in separate, secure areas in order to limit access to authorized individuals only.

In the case of all active, and most semi-active, private dossiers this area will be located in, and managed by, the originating service. In the case of some semi-active, and all inactive, private dossiers, this area will be located in the designated archives storage areas, and controlled by the person responsible for the day-to-day management of the College archives.

¹ For procedures relating to the management of public records, see *Heritage College Administrative Procedure #4*.

² Refer to *Heritage College Policy #22 concerning Archives Management* for details regarding terms of reference and areas of responsibility.

³ As set out in article 3.2.1 of *Heritage College Policy #22*.

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2. Access to Private Records

In accordance with article 4.2 of *Heritage College Policy #22*, the administrator responsible for each originating service compiles an “Authorization List for Access to Private Records” which shall include the titles of employees within that service who may access private dossiers without submitting a formal, written request. The person responsible for the day-to-day management of the College archives must be provided with updated copies of this list as they become available, or at least every six months.

Requests for access to private dossiers from individuals without prior authorization are to be made in accordance with the terms of the *Law on the Access to Documents held by Public Bodies and the Protection of Personal Information*.

The Director General will determine whether said request for access can be granted under the terms of the Law. When a decision has been reached, the Director General’s office will inform the person requesting access in the manner specified in the Law, and will take the appropriate action.

When access is granted, it will take place, by appointment only, in a pre-determined access area in the College, and will be monitored by an authorized employee of the College. Private records are not to be removed from the designated access area. Fees for transcription or reproduction of records are governed by the Quebec *Regulation respecting fees for the transcription, reproduction or transmission of documents or nominative information*.

3. Private Records Inventories

In accordance with article 3.5.1 of *Heritage College Policy #22*, each originating service shall compile and maintain a records inventory comprising a sequential listing of all private dossiers created and maintained by that service. The private records inventory must be kept separate from the public records inventory, with access being limited to employees whose titles are listed in the “Authorization List for Access to Private Records.”

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Each private records inventory shall clearly display:

- the name of the College
- the title of the service
- the two-letter alphabetic service identification code⁴
- a clear indication that it pertains to “private” records
- the title of the individual who maintains the inventory, and
- the most recent date of revision.

Furthermore, an updated copy of the private records inventory must be forwarded whenever a revision is made, or at least every six months, to the person responsible for the day-to-day management of the College archives.

4. Management of Inactive Private Records

When private records become inactive (i.e., the semi-active retention period has been completed), they are to be designated either for transfer to the designated archives storage area or for destruction by the originating service, according to the provisions of the *Conservation Calendar*.

4.1 Transfer of Inactive Private Records

Each originating service packs the private records for transfer, sequentially, in standard archive storage boxes. Each box must clearly display:

- the service identification code
- the notation “Private”
- the appropriate box number (using the next number in the series for that service as indicated by the *Archives Catalogue*), and
- a list of its contents.

Each originating service prepares a corresponding private records transfer inventory which clearly indicates:

- the service title and identification code
- a clear indication that it pertains to “private” records

⁴ See the legend on the cover of the *Heritage College Conservation Calendar*.

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- the date
- the name and title of the individual who prepared the inventory, and
- a detailed, numerical listing of all boxes (and their contents) to be transferred to the designated archives storage area.

This inventory will be forwarded to the person responsible for the day-to-day management of the College archives, who will arrange for the necessary physical transfers and update the private records section of the *Archives Catalogue* accordingly.

4.2 Destruction of Inactive Private Records

If applicable, the private records transfer inventory shall include a detailed, sequential listing of all inactive private dossiers which have been designated for destruction by the originating service. Each entry will indicate whether the dossier is in the service awaiting disposal, or already housed in the archives storage area awaiting transfer back to the service for disposal. (The person responsible for the day-to-day management of the College archives will make the necessary physical return transfer arrangements, upon request.)

In accordance with the terms of the *Regulation respecting retention schedules, transfer, deposit and disposal of public archives*, records designated for destruction shall be burned or shredded. This action is the responsibility of the originating service. If quantities are sufficient to warrant contracting the services of an outside company, the work shall be done on campus and monitored by an authorized employee from the originating service.

When the originating service has confirmed to the person responsible for the day-to-day management of the College archives that disposal of a particular dossier or group of dossiers has taken place, the latter will ensure that a corresponding notation is added to the private records section of the *Archives Catalogue*.

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Important: When the contents of an entire box have been destroyed, the box number is not to be reused; rather, its number and contents are to remain listed in the *Archives Catalogue* with a notation to that effect.

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Related Documents⁵:

This document is to be used in conjunction with:

- *Heritage College Policy #22 concerning Archives Management*
- *Heritage College Administrative Procedure #4 relating to the Management of Public Records*
- *Heritage College Conservation Calendar*
- *Heritage College Archives Catalogue*
- *Archives Act (R.S.Q., c. A-21.1)*
- *Regulation respecting Retention Schedules, Transfer, Deposit and Disposal of Public Archives (R.S.Q., c. A-21.1, r. 1)*
- *Act respecting Access to Documents held by Public Bodies and the Protection of Personal Information (R.S.Q., c. A-2.1)*
- *Regulation respecting fees for the transcription, reproduction or transmission of documents or nominative information (R.S.Q., c. A-2.1, r. 1.1)*

⁵ Copies of these documents are available in the Director General's office, for reference purposes.