

Shredding/Destruction Procedure For 'Consoles'

George Brown College Archives is responsible for *all* shredding from *all* departments, offices, and employees of the College. Put quite simply, whatever cannot just be tossed in the recycling bin *must* be destroyed by the Archives in the manner described by this procedure. Erring on the side of caution, all material containing information about students, employees, and the business of GBC is destroyed in the same manner, ensuring that no sensitive information of any kind will be leaked to the public.

George Brown College has a *Records Management Policy Framework* which outlines the College's perspective on records. The *Framework's* Principles state that "Effective records management ensures that the records maintained are ... Disposed of accountably, and as legislation requires" (*Framework*, s. 1). Also, GBC must adhere to Ontario's *Freedom of Information and Protection of Privacy Act (FIPPA)*, which makes clear the College's responsibilities in its collection, use, and destruction of personal information. Regulation 459 of *FIPPA*, Disposal of Personal Information (found at http://www.e-laws.gov.on.ca/html/regis/english/elaws_regs_900459_e.htm) states that

An educational institution may dispose of personal information in the following ways only:

1. By destroying the personal information.
2. By transferring it to the archives of another educational institution, in accordance with an agreement between the educational institutions authorizing the transfer.
3. By transferring it to the Archives [of Ontario], in accordance with an agreement between the educational institution and the Archivist of Ontario authorizing the transfer. (O. Reg. 91/07, s. 1 (2)).

GBC has its own Archives which cares for all records that are retained permanently or long-term, which leaves only the 1st point above valid: personal information must be destroyed when it is no longer needed. The *Framework* explains that

Destruction through the College Archives is mandatory for all G.B.C. records types that are "Listed" in Ontario's Freedom of Information and Protection of Privacy Act Directory of Records as "Personal Information Bank" records (*Framework* s. 7.5).

The rules governing this destruction are also very clear: "Where personal information is in the custody or under the control of an institution, no person shall destroy it without the authorization of the [institution's] head" (R.R.O. 1990, Reg. 459, s. 3). This authorization is ensured through the Archives' shredding procedure. Obviously, GBC's President cannot actually control every record, so "Operational responsibility for GBC's records rests locally with each department head, including staffing and resource allocation support" (*Framework* s. 7.2). This initial operational responsibility for records ensures that "all reasonable steps are taken to protect the security and confidentiality of personal information that is to be destroyed, including protecting its security and confidentiality during its storage, transportation, handling and destruction (R.R.O. 1990, Reg. 459, s. 4 (1)).

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Beyond the protection of personal information required of GBC, *FIPPA* specifies the criteria for adequate destruction of information: "Every head shall take all reasonable steps to ensure that when personal information is to be destroyed, it is destroyed in such a way that it cannot be reconstructed or retrieved" (R.R.O. 1990, Reg. 459, s. 5.). Throughout the destruction process, the "head of [the] institution shall ensure that the institution maintains a disposal record setting out what personal information has been destroyed ... and the date of that destruction" (R.R.O. 1990, Reg. 459, s. 6 (1)). GBC's *Framework* covers this point of legislation by mandating that GBC "Archives ensures proper 'Head of Institution' authorization signatures are obtained prior to the destruction, ensures it is carried out properly, and retains permanently the necessary "Certificate of Destruction" required by the legislation / regulations" (*Framework* s. 7.5).

The Shredding/Destruction Procedure:

If you have documents/material matching the record types listed on the Shred Console Tracking Sheet:

- Printed email
- Working notes or memos containing ANY business or personal information
- Duplicates of documents
- Printing/copying errors containing ANY business or personal information
- Student assignments OLDER THAN 1 ACADEMIC TERM

Simply place the material in the console and **fill in the tracking sheet**.

It is essential that the tracking sheet is filled in completely. This information is required by law in order for GBC to destroy the material. If the tracking sheet is not filled out correctly, your department will have to go through the entire console to discover what is in it, and then fill out the tracking sheet.

Managers responsible for the consoles will be vigilant to ensure that this procedure is followed by all staff and faculty.

At the designated pick-up date (or when the console is full), the console must be sealed, the tracking sheets and manager's authorization sent to Archives, and the console will be emptied by Tippetts Records Management staff once Head of Institution authorization is obtained.

There will be a small delay while signatures are obtained, but this is impossible to avoid. Staff will simply have to keep their shredding for 1 or 2 days until the console can be emptied.