

	Records Management	Corporate Policy & Procedures Manual
		Number: III-55
Approved by: Chief Executive Officer	Date Approved September 27, 2018	
	Date Effective February 8, 2019	
	Next Review (3 years from Effective Date) February 2022	

NOTE: The first appearance of terms in bold in the body of this document (except titles) are defined terms – please refer to the *Definitions* section.

Purpose

- To outline the requirements for the management of **records** created and maintained by, or on behalf of, Covenant Health.
- To ensure Covenant Health records are managed in accordance with applicable legislation and Covenant Health standards.

Policy Statement

Covenant Health is responsible for protecting the integrity of its records and is committed to supporting organizational accountability, transparency, efficiency, and economy through the proper handling and retention of records.

All records created and received by Covenant Health are the property of Covenant Health. Upon changing position or leaving the employment or a contractual relationship with Covenant Health, the employee/contractor/student/volunteer must leave all records with Covenant Health.

Applicability

This policy and procedure applies to all records (paper and electronic) created and maintained by, or on behalf of, Covenant Health staff, physicians, volunteers, students and any other persons acting on behalf of Covenant Health.

Policy Elements

1. **Destruction of Records:** Destruction of records shall not occur in contravention of the standards identified in Appendix A or in contravention of legal hold.
2. **Legal Hold:** Records that are subject to a legal hold will not be disposed of per the record retention schedule. Refer to Appendix B.
3. **Record Retention:** Records identified in Appendix C shall be retained as noted in the Schedule. These record retention periods are consistent with current relevant legislation and corporate requirements and identify the minimum retention periods.

Responsibility Covenant Health staff, physicians, volunteers, students and any other persons acting on behalf of Covenant Health are responsible to ensure their record handling practices align with the requirements of this policy/procedure.

Department leaders shall demonstrate compliance with this policy by providing their direct reports with appropriate training/education for records management specific to their area.

Principles Records are valuable resources and assets created to meet operational, legislated, financial, and historical requirements.

Access to Covenant Health records, regardless of format (including, but not limited to, paper and electronic records) or locations, shall be authorized in accordance with applicable legislation and Covenant Health policies/procedures.

Definitions **Record** means documents, data or information of any kind, in any medium (e.g., paper, digital, and audio-visual media), and in any format (e.g., documents, spread sheets, databases, emails, blogs, wikis, and website pages) created, received, recorded, and maintained by Covenant Health as part of its services or business. This definition includes health records but does not include computer software of any mechanism that produces records.

Master record means the official 'file copy' of the record held by Covenant Health. Normally the master record will be held by the division/department/program/unit which originated the record, which received the record from another party external to Covenant Health or which has responsibility for its custody.

Examples: The 'file copy' of correspondence is normally held by the unit sending or receiving the correspondence. However, a hospital patient information department is the custodian of some patient records which are generated by others.

Transitory record means records in any media that:

- have no further value or usefulness beyond an immediate and minor transaction;
- are only required for a short time during and not usually after a transaction;
- are made obsolete by an updated version of a record, subsequent transaction or decision;
- are a duplicate or copy of a record filed elsewhere; or
- are a work in progress or draft version that will have no further value once the final version is produced.

Transitory records do not document patient/resident/client care, document a decision or transaction, support business activities, provide evidence of compliance with legislative requirement, nor have future business, financial,

legal, research or archival value to Covenant Health.

Confidential material means any individually identifiable health information, such as patient records and diagnostic and treatment records, as well as employment records, corporate records, budget reports, contracts, financial statements, and/or general ledger detail, all of which contain private information that needs to be protected from any access by unwarranted parties or agencies.

Destruction means the disposal of records of no further value by incineration, maceration, pulping, granulizing, or shredding with the objective of obliteration beyond any possible reconstruction.

Legal hold means a hold placed on the scheduled destruction of records due to foreseeable or pending litigation, governmental investigation, audit, or special organizational requirements as initiated in accordance with Appendix B.

Related Documents

Appendix A – Destruction of Records
Appendix B – Legal Hold
Appendix C – Covenant Health Records Retention Schedule

Covenant Health P/P #III-5, *Reporting/Investigating Legal Actions and Potential Legal Actions*

References

Alberta Health Services;

- Records Management Policy
- Records Destruction Procedure
- Legal Hold Procedure
- Transitory Records Procedure
- Records Retention Schedule
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Alberta College of Pharmacists; Standards for the Operation of Licensed Pharmacies, Sections 8.3, 8.7 and 8.8

Alberta Evidence Act

Alberta Health Care Insurance Act

Canada Pension Plan and CPP Regulation

Controlled Drugs and Substances Act

Employment Insurance Act and EI Regulation

Employment Standards Code

Environmental Protection and Enhancement Act

Excise Tax Regulation

Food and Drug Regulation

Freedom of Information and Protection of Privacy Act

Health Canada; Guidance Documents for Industry and Practitioners – Special Access Programme for Drugs. Effective date January 28, 2008.

Health Information Act

Hospitals Act

Income Tax Act

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*Labour Relations Code
Limitations Act
Narcotic Control Act
Occupational Health and Safety Act
Workers' Compensation Act*

Revisions

October 5, 2018
October 15, 2012

Destruction of Records

1. Destruction of records shall not take place without prior review of the Record Retention Schedule (Appendix 1) to confirm that the record has reached its maturity date.
2. Records that are not identified on the Record Retention Schedule (Appendix 1) may be destroyed as long as they are no longer in active use and no negative impact or consequences for Covenant Health will occur if the document is destroyed.
3. All records shall be handled and disposed of in a manner appropriate for the confidentiality of information they contain. Confidential paper materials shall be discarded into a secure collection cabinet (INFO-SAFE container) or bag, or shredded within the department. Non-paper media (e.g., microfiche, microfilm, diskette, computer disk, etc.) that contain confidential information are to be securely boxed, sealed, and marked "Confidential – Secure Destruction" and shall be kept in a secure area (such as a locked office) in the area of origin while awaiting secure pickup and disposal.
4. The collection and removal of confidential material from the respective areas of origin will be handled by designated staff (e.g., Housekeeping). The on-site storage of confidential material will be kept within a restricted and secure area that is accessible only by designated staff and/or the shredding contractor.
5. To facilitate the efficient and orderly use of record storage space throughout Covenant Health facilities, the Facilities Planning Department shall allocate storage areas to departments as required.
6. Records remaining from a discontinued program must be managed and reviewed for continued retention, archiving or destruction.
7. Advice on the disposition of records will be provided by Covenant Health Risk Management/Legal Counsel.

Appendix B**Legal Hold**

1. Destruction of records shall not occur where there is knowledge of, or notification of:
 - a) claims, fatality inquiries, litigation, or potential litigation relating to the records to be destroyed;
 - b) receipt of a FOIPP or HIA request relating to the records to be destroyed;
 - c) investigations and audits; or
 - d) direction from Covenant Health legal counsel or senior executive.
2. Records in legal hold shall be preserved by ensuring the original records are in or are moved to a secure location. Copies may be created for ongoing use.
3. Legal holds shall be initiated by the Covenant Health Risk Management/Legal Counsel when;
 - a) formal notice has been received of legal action against Covenant Health (e.g., a Statement of Claim, Originating Notice, other formal notice of the commencement of a legal action). Refer to Covenant Health P/P #III-5, *Reporting/Investigating Legal Actions and Potential Legal Actions*;
 - b) Covenant Health has been notified of potential or anticipated legal action;
 - c) Covenant Health has received a request for information or has been notified of review, investigation or inquiries by the Office of the Information and Privacy Commissioner, or
 - d) or in any other circumstances that the Covenant Health Risk Management/Legal Counsel deems appropriate (e.g., fatality inquiries).
4. Covenant Health Risk Management/Legal Counsel shall;
 - a) notify areas of accountability or individuals of the initiation of a legal hold, including Information Management personnel, and which records are considered responsive and are subject to the legal hold; and
 - b) maintain a master list of all legal holds in place within Covenant Health.
5. For removal of legal holds, Covenant Health Risk Management/Legal Counsel shall notify areas of accountability or individuals, including Information Management personnel, when a legal hold has been removed.

Legal holds responsive to FOIPP/HIA records shall be removed six months from the date of closure of the request.

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APPENDIX C	Description	Retention Period	Disposition	Notes
Administration	Records With Historical Relevance	Permanent		For example, history of hospital/facility, corporate annual reports, philosophy and mission statements.
Administration	Meeting Agendas, Minutes and Committee Reports where decision is required at the Program Level	6 Years after dissolution of Committee		To be retained by Chair/Director, or Designated Secretary
Administration	Meeting Agendas, Minutes and Committee Reports where decision is required at the Unit Level	3 years		To be retained by Chair/Manager, or Designated Secretary
Administration	Meeting Agendas, Minutes, and Committee Reports where decision is required at the Executive Level	11 years		To be retained by Chair/Executive, or Designated Secretary
Administration	Policies and Procedures:	Superseded or obsolete plus 11 years		Corporate policies retained by Policy and Procedures Office. Other policies (e.g., unit-specific) retained by unit/program.
Administration	Program Coordination, Planning and Delivery, Performance Measurement or Evaluation	5 years		Information related to aligning, coordinating and setting the plan for the development and provision of programs or services. Includes operating parameters of the program/service and defining the design and administration of the program/service area including impact analysis records.

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APPENDIX C	Description	Retention Period	Disposition	Notes
Capital Planning	Architectural Drawings & Plans 'As Built', and Renovations	Permanent	Permanent	Records relating to all original as issued drawings including architectural, electrical, mechanical, civil/structural, and fire protection.
Capital Planning	Capital Builds & Renovations	11 years	Permanent	<p>Information related to the management of the request, proposal review, approval and implementation processes. Planning includes terms of reference, project plan and request for proposals; General Administration includes progress reports, correspondence and timeline; Financial includes budget or cost centers, invoices, insurance, leases and contracts; design development bid documents includes specifications, drawings, and addendums; Contract administration includes changes orders, permits, certificates of final completion and furniture and equipment. Renovation request, proposal review, approval and implementation processes. This includes renovations required due to the physical expansion or amalgamation of offices.</p> <p>Limitations Act section 3, Canada Income Tax Act (230,230.1)</p>
Capital Planning	Asset Management.	7 years	Selective Retention as determined by the Archivist	Acquisition & management of physical assets, such as buildings, land, major equipment, vehicles,

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				telecommunications equipment etc. Includes summaries of transactions, copies of invoices and receipts and purchases journals, fixed asset inventories, depreciated assets lists, surplus equipment, and write offs. Records also include government and commercial licenses and permits for use and operation of equipment, buildings, land, and permits, software licenses. Canada Income Tax Act ss230, 230.1 Income Tax Regulation 5800 and Information Circular 78-10RC
Capital Planning	Post-occupancy Data	3 years after completion of project	Recycle	
Capital Planning	Site Survey Reports	Permanent	Hard Copy/ Capital Planning	
Capital Planning	Functional Programs and Space Inventory	Permanent	Hard Copy/ Capital Planning	
Clinical Affairs	Medical Staff Files	Permanent		Information related to the accreditation of professional staff, assignment of privileges, credentials, physician files, and specific physician complaints and assignment of clinical department heads.
Clinical Affairs	Curriculum (Aims and Objectives or Guidelines for Service)	3 Years		
Clinical Affairs	On-call Schedules/ Rotations	11 Years		
Clinical Affairs	Appeals	Permanent		

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APPENDIX C	Description	Retention Period	Disposition	Notes
Clinical Engineering	Inspections of medical equipment.	Permanent Provincial Database		
Education	Staff Training	Superseded or obsolete plus 3 years		Information related to the development of content used for learning purposes.
Education	Staff Training – Attendance and Scheduling	5 years		Information related to the training and development of staff through in-services, programs of selection, assignments, self development and programmed training. Includes staff training and orientation, competency assessments.
Facilities Maintenance & Engineering	Environmental Sustainability	30 years	Hard Copy/Computer Storage/Facilities Maintenance	Information related to the utilities used such as gas, air conditioning, hydro-power, plumbing, heating, water and sewage. Records include historical data on cost distribution, requirement reports, specifications relating to the installation and maintenance of utilities and inspections. Canada Income Tax Act ss230, 230.1. Income Tax Regulation 5800 and Information Circular 78-10RC
Facilities Maintenance & Engineering	Waste Management – Manifested Hazardous Waste	Permanent	Permanent	Information related to manifested hazardous waste disposal. Includes manifests of transfers to waste treatment disposal services. Environmental Protection & Enhancement Act and Waste Control Regulation

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APPENDIX C	Description	Retention Period	Disposition	Notes
Facilities Maintenance & Engineering	Equipment - Warranties	1 year	Destroy	Information related to maintaining original warranties and any supporting documentation for equipment owned by the organization.
Facilities Maintenance & Engineering	Property Maintenance	3 years	Destroy	Information related to the maintenance of physical work environments. Includes general maintenance activities such as cleaning, repairs and maintenance logs for buildings and non-hazardous waste management.
Facilities Maintenance & Engineering	Elevator Inspection Reports	Permanent	Hard Copy/Computer Storage/Facilities Maintenance	
Facilities Maintenance & Engineering	As-built Drawings (actual permanent blueprints covering all systems)	Permanent	Hard Copy/Computer Storage/Facilities Maintenance	
Facilities Maintenance & Engineering	Property Management	11 years	Destroy	Information related to the operation of physical assets, such as buildings, land, major equipment, telecommunications equipment etc. Includes space allocation & planning, summaries of transactions, copies of invoices and receipts and purchases journals. Limitations Act section 3
Facilities Maintenance & Engineering	Operations Log Book	Permanent	Hard Copy/Computer Storage/Facilities Maintenance	

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APPENDIX C	Description	Retention Period	Disposition	Notes
Facilities Maintenance & Engineering	Asbestos Removal Records	Permanent	Hard Copy/Computer Storage/Facilities Maintenance	
Finance	Accounting General Ledger	Permanent		per Canada Income Tax Act and Regulations
Finance	Accounts Payable / Accounts Receivable	7 years		
Finance	Banking	7 years		
Finance	Budget / Financial Planning	6 years		
Finance	Capital Assets	7 years		Capital assets include equipment, real estate, land and buildings and their construction, acquired at a cost of over \$5000 and have a useful life of more than one year and which is used in business operations to render a service. Record is still considered active until asset is capitalized and/or audit has been completed.
Finance	Client Trusts	7 years		
Finance	Financial Reporting – Quarterly	3 years		
Finance	Grants / Funding	7 years		
Finance	Procurement of Products or Services	3 years		
Finance	Taxation	7 years		
Governance / Board Of Directors	Board Administration	Permanent		Information related to the business processes undertaken by the Board to carry its mandate, including relationships with government and the community. It includes the appointment of members, its responsibilities, activities and

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APPENDIX C	Description	Retention Period	Disposition	Notes
				decisions. Includes bylaws and minutes.
Governance / Board Of Directors	Annual Reports	Permanent		
Governance / Board Of Directors	Board / Executive Committees	Permanent		Information related to Executive interaction with other bodies structured for specific tasks. Committees may include, but are not limited to steering, sub-committees, work groups, task forces, Board meetings, Facility Leadership Council meetings, etc. Records include minutes, agendas, records of decisions, reports and terms of reference.
Governance / Board Of Directors	Board Policies & Procedures	30 years		
Human Resource Management	Benefits	3 years		Employment Standards Code s.15, Canada Labor Code, Employment Pension Plan Act. Information related to the development, initiation, tracking, approval, reporting and remittance of group and individual benefits on behalf of the organization. Includes long term disability, life insurance, Blue Cross, Alberta Health Care and dental plan and union dues donations.
Human Resource Management	Classification Evaluation	10 Years		
Human Resource Management	Collective Agreements	Superseded or obsolete plus 11 years	Hard Copy/Human Resources Dept.	

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APPENDIX C	Description	Retention Period	Disposition	Notes
Human Resource Management	Compensation / Pay Bands	5 years		
Human Resource Management	Employee Files	Termination plus 11 Years		Master records retained by Human Resources Department.
Human Resource Management	L.A.P.P. Reports and Pension Correspondence	Permanent		
Human Resource Management	Labour Relations / Collective Bargaining	11 years		Activities associated with the organization's employees and their representatives. Includes collective bargaining administration and agreements, awards, grievances.
Human Resource Management	Personal information used to make a decision about an individual.	1 Years		Hard Copy/In Respective Department/Unit
Human Resource Management	Position Classification Reviews	11 years		
Human Resource Management	Position Descriptions	11 years		
Human Resource Management	Recruitment Competitions (includes job postings)	Current plus 1 Year		
Human Resource Management	Staffing Rotations	Up to 2½ years		
Human Resource Management	Union Grievances	6 Years After Resolution		
Infection Control	Communicable / Infectious Disease Reporting and Management & Statistics	5 years		Public Health Act
Infection Control	Communicable Disease – Tuberculosis & Syphilis	until client reaches 100 years		
Infection Control	Communicable Disease Outbreaks	20 years		

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APPENDIX C	Description	Retention Period	Disposition	Notes
Information And Privacy	Information related to the monitoring, investigation and granting of formal requests for access to personal information or health information under the Health Information Act.	11 years	Destroy	Health Information Act s. 41 Includes requests for information & responses, breach investigations, correction requests & OIPC reviews.
Information And Privacy	Information related to the monitoring, investigation and granting of formal requests for access to personal information or general information under the FOIP Act.	5 years	Destroy	Includes requests for information & responses, breach investigations, correction requests & OIPC reviews.
Laboratory Services		Adhere to the AHS policy and retention schedule as outlined in the Laboratory "Quality Manual" @ http://insite.albertahealthservices.ca/7415.asp		
Medical Device Reprocessing	Biological Monitoring Records Sterilization Records; Steam and Low Temperature High Level Disinfection Records	5 years		
OH&S	Employee Health Records – Hazardous	Termination plus 40 years		OHS Code 2009. Information related to the health of employees exposed to hazardous

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APPENDIX C	Description	Retention Period	Disposition	Notes
				materials and environments such as asbestos, chemicals or radiation.
OH&S	Employee Health Records	Termination plus 11 years		Information associated with the occupational health and safety administration of individual employees. Includes audiometric tests, work environment assessments, workers compensation claims, short and long term illness administration and compensation documentation – including return to work plans, immunization records, and nurses notes.
OH&S	OHS reports relating to incidents involving staff injury	Termination plus 11 Years		
OH&S	Workplace noise exposure assessments	Permanent		
OH&S	Work Site Evaluation with regard to the health and safety of employees.	3 Years After Termination		Includes assessment of work environment, evaluation of unsafe/healthy work conditions, confined space entry records, awareness and training programs, WHMIS and TDG (excludes workplace noise exposure)
Patient / Resident / Client Clinical Records (Note: Hereafter, all references to 'Patient' includes patients, residents, and clients)	Inpatient / Outpatient Records (including EMS, wound care or other services)	For Adults: 11 Years from date of discharge For Minors: to age 30	One year after discharge, microfilm and destroy originals by shredding.	When a potential or actual legal action is known, retain records until notification is received from Risk Management that the records may be disposed of. Records will be retained until the litigation is complete or the claim is abandoned plus 11 years.

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				per Alberta Hospitals Act, Operation of Approved Hospitals Regulations, Section 15(3)
Patient / Resident / Client Clinical Records	Canadian Institute for Health Information (CIHI) and Alberta Health Statistical Reports	5 years	Delete	
Patient / Resident / Client Clinical Records	Census Reports	2 Years	Shred	
Patient / Resident / Client Clinical Records	CIHI and Alberta Health Error Reports	1 year	Delete/Destroy	
Patient / Resident / Client Clinical Records	CIHI Submission Reports and	1 year	Delete	
Patient / Resident / Client Clinical Records	Coding Manuals used to assign diagnostic and procedure codes to clinical data.	30 years after manual is superseded	Destroy	
Patient / Resident / Client Clinical Records	Patient Records – Clinical Trials	25 years after research completed or date of discharge/ last contact / deceased. Destroy unless blood products have been received		Health Canada guidance for Records Related to Clinical Trials – section 6.0. Information related to adults and minors participating in clinical trials. Includes assessment, diagnosis, screening and treatment of a client (all settings), identity of client, justification for treatment and documented results.

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APPENDIX C	Description	Retention Period	Disposition	Notes
				Refer also to the "Research" category.
Patient / Resident / Client Clinical Records	Patient Registries	Permanent		Information related to legacy indexes or registers listing all patients treated at a facility.
Patient / Resident / Client Clinical Records	Records of blood products	Permanent		
Patient Relations	Patient Complaints or other incident reports	11 Years For minors: to age 30		
Payroll	Daily Flow Sheet and Bi-weekly Timesheets submitted to designated department Timekeeper / Time Approver by employee	Daily Flow Sheet is retained by the designated department. Timesheets are retained by Timekeeper / Time Approver for minimum of 1 year after submission.		Considered transitory document. Potential discrepancies in compensation will only be calculated and recovered for the twelve month period previous to the discovery of the error or as per the specific collective agreement.
Payroll	Employment Insurance. Master File	Current plus 6 Years		
Payroll	T4's	Current plus 6 Years		
Payroll	Payroll records are retained by e-People System	7 years		
Pharmacy	Narcotic Control Records	2 Years	Shred	
Pharmacy	Outpatient Prescriptions	4 Years	Shred	
Pharmacy	Information related to direct provision of patient care. Includes records of care (e.g., administration, adapted prescriptions), and drug error records (e.g., drug incident, adverse drug events) and manufacturing (e.g.,	11 years	Shred	

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	sterile and non-sterile, narcotic, and chemotherapy).			
Pharmacy	Information relating to drugs unavailable for sale in Canada, obtained through the Special Access Program. Includes applications, Health Canada approvals, drug purchases and requisitions	25 years	Shred	
Protective Services	Investigation Reports	11 Years		
Protective Services	Officer Note Books	11 Years		
Protective Services	Security Surveillance Tapes	After calendar year, tapes to be treated as Transitory Record unless an incident is captured. If an incident is captured then 11 years retention.		
Quality Assurance	Accreditation Survey Results and Reports	Permanent		
Quality Assurance	QA Reports (audits, statistics, worksheets)	11 Years For minors: to age 30		
Quality Assurance	Records related to a formal review (other than an active legal claim) or investigation.	11 Years For minors: to age 30		
Research	Research Administration including research proposals, scientific evaluations, approved	Research Completed plus 15 Years	Destroy	

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APPENDIX C	Description	Retention Period	Disposition	Notes
	consent documents, progress reports, reports of injury, amendments and other administrative records.			
Research	Research Studies including notes, recordings, printouts, questionnaires, surveys, raw data and material products including slides, pictures and x-rays.	Research Completed plus 5 Years		Principal Investigator – investigators shall be responsible for all storage space, costs and protection of data. Costs of storage should be provided by Sponsor in funded research.
Research	Research Finance Records	Research Completed plus 7 Years		CRA. https://www.canada.ca/content/dam/cra-arc/migration/cra-arc/E/pub/tp/ic78-10r5/ic78-10r5-10e.pdf
Research	Clinical Trials including methodologies, data and reports, clinical research protocols, diagnostic imaging reports, copies of participant's records.	Research Completed plus 25 Years		Principal Investigator – investigators shall be responsible for all storage space, costs and protection of data. Costs of storage should be provided by Sponsor in funded research. Clinical trials research records – 25 years [Health Canada, Division 5 regulations, 5.2, C.05.012, 4.] https://www.canada.ca/en/health-canada/services/drugs-health-products/compliance-enforcement/good-clinical-practices/guidance-documents/guidance-records-related-clinical-trials-guide-0068.html

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APPENDIX C	Description	Retention Period	Disposition	Notes
Risk Management / Legal	Records related to active legal claims	Litigation completed or abandoned plus 11 Years		
Risk Management / Legal	Business Continuity Planning	Superseded or obsolete plus 5 years		Information associated with ensuring that in the event of an emergency, continuity/recovery plan is in place, tested, and working efficiently and effectively.
Risk Management / Legal	Contracts	Over \$75,000 permanent. Less than \$75,000 11 years after contract ends		Information related to the creation and final approval of contracts, agreements, memorandums of understanding, etc. including third party agreements.
Risk Management / Legal	Independent Contractor Services, Consulting, Facilities Leases, Practicum Agreements	Termination date plus 11 years.		
Risk Management / Legal	Insurance Claims	Claim complete plus 11 years		
Risk Management / Legal	Legal Opinions and Advice	Retain until superseded or obsolete		
Risk Management / Legal	Records related to potential legal claims.	11 Years For minors: to age 30		