

TYPE:	Administrative
TITLE:	Electronic Imaging and Document Management
NO.:	ADMIN-256
RESPONSIBILITY:	Chief Administrative Officer
APPROVED BY:	Durham College Leadership Team
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1. Introduction

This policy and procedure applies to electronic imaging and document management systems maintained in support of College business processes where an electronic image is intended to replace an original paper document or an electronic file and be accepted as evidence in a court of law.

2. Purpose

This policy and procedure establishes clear organizational standards and guidelines for electronic imaging and document management systems. This policy and procedure applies to all electronic imaging and document management systems maintained for the support of the College's business processes where an electronic image is intended to replace an original paper document or an existing electronic file and be accepted as evidence in the court of law. These standards include:

- Electronic images of College records must comply with Canadian General Standards Board (CGSB) standards (CAN/CGSB-72.34-2017.)
- College records, regardless of format must be classified and retained as per the Durham College Common Records Schedule and other legislative and legal requirements.
- To ensure the acceptance of electronic images as evidence in legal matters, once a record is quality controlled, the original paper source record must be shredded and disposed of within the established time frame, usually 90 days after the original scan. The only exception will be those records defined as having permanent value. Those records will be transferred to the College Archives.

3. Definitions

Refer to [Durham College's Standard Definitions](#).

4. Policy statements

All Document Imaging Programs at the College must be compliant with Canada General Standards Board Electronic Images as Documentary Evidence CAN/CGSB-72.34-2017.

4.1. Features of a Document Imaging Program

- 4.1.1. Images must provide a complete and accurate reproduction of Source Records.
- 4.1.2. Imaging will be conducted in the usual and ordinary course of business according to the department's local written procedures.
- 4.1.3. Capture, indexing and destruction of Source Documents must be completed within a reasonable time frame after the creation or receipt of the Source Documents.
- 4.1.4. Quality Control is paramount to establishing accuracy, reliability and trustworthiness of Images. Quality Control requires:
 - a) Operating according to established Local Procedures;
 - b) Keeping a record of all activities, including Capture, Indexing, storage, modifications and destruction; and
 - c) Verifying the completeness of capture, indexing, and ensuring that any modifications do not alter the content or interpretation of the Source Record. A record must be kept of these Quality Control activities.
- 4.1.5. Any changes to format must avoid altering the content of the Source Record.
- 4.1.6. Storage, retention and protection of Images must be in accordance with Records Management Policies and Procedures.

5. Procedure

This procedure provides the authority to Document Imaging Programs at the College as required by the standard and establishes principles to ensure the accuracy, completeness and trustworthiness of images.

5.1. Authorization for Document Imaging Programs

- 5.1.1. A department shall identify the types of information to be scanned, indexed, and where the information is to be stored after scanning and after indexing. The request to proceed with the Document Imaging Program is to be submitted to the Records Manager for approval.

- 5.1.2. Complete the Authorization for Document Imaging form and submit to the Records Manager at DCrecordsmanagement@durhamcollege.ca
 - 5.1.3. The Records Manager Liaison for each department is to maintain a list of all approved document types and records.
- 5.2. Process Documentation
- 5.2.1. Any department that wants to implement a Document Imaging Program must develop a set of local written procedures for their Document Imaging Program that meet the procedural requirements of the Canada General Standards Board Electronic Images as Documentary Evidence CAN/CGSB-72.34-2017 standard.
 - 5.2.2. A copy of the department's written procedures (paper or electronic) will be presented to the Records Manager for approval prior to starting the Document Imaging Program.
 - 5.2.3. The department's written procedures must be kept up to date at all times. Any modification to procedures must be documented and approved by the Records Manager before it is carried out.
 - 5.2.4. The department's written procedures must include:
 - a) A listing of the types of Documents authorized for imaging and where the documents will be stored.
 - b) A listing of the types of source records authorized for routine destruction and those which are not authorized for destruction due to identified requirements.
 - c) Criteria for Quality Control.
 - d) Standards for timelines of operations.
 - e) Description of systems and equipment.
 - f) Procedure for Capture
 - g) Procedure for Indexing
 - h) Procedure for Quality Assurance
 - i) Procedure for Certification and Registration
 - j) Procedure for Destruction of Source records
 - k) Procedure for Protection of Images
 - l) Procedure for applying Record Retention and Disposition rules to

Images.

5.3. Destruction of Source records

- 5.3.1. Source records may be destroyed as part of an authorized Document Imaging Program once the accuracy and completeness of images have been verified. A Records Destruction Form must be submitted for approval by the Records Manager prior to the destruction of the Source records. This will act as the record that must be kept of the destruction of Source records.
- 5.3.2. Images created by an authorized Document Imaging Program are deemed to be the Official College Records following the destruction of the Source records.
- 5.3.3. Source records may not be destroyed where contractual, legal or regulatory requirements dictate that an Image is not an acceptable format for retention of the Record.

6. Roles and responsibilities

- 6.1. The Durham College Leadership Team is responsible for reviewing and approving the policies, procedures, and other controls required for security, lifecycle management, risk management, and quality assurance of College information.
- 6.2. The Records Manager is responsible for authorizing Document Imaging Programs for College Records. The Records Manager is responsible for reporting any new Document Imaging Programs to the VP Administration & CFO.
- 6.3. The Records Manager is responsible for assisting departments with the creation of local written procedures for Document Imaging Programs that comply with Canada General Standards Board Electronic Images as Documentary Evidence CAN/CGSB-72.34-2017.
- 6.4. Information Technology Services is responsible for providing and maintaining secure systems for Image storage and protection. The systems must allow Images to be retained according to the Common Records Schedule and the Information Management Policy and Procedure.
- 6.5. The most senior executive in the department is responsible for ensuring that all local written procedures for Document Imaging Programs in their department are being adhered to within their department.

7. Accessibility for Ontarians with Disabilities Act considerations

Accessibility for Ontarians with Disabilities Act (AODA) standards have been considered in the development of this policy and procedure and it adheres to the principles outlined in the College's commitment to accessibility as demonstrated by the Accessibility Plan (ADMIN-203).

8. Non-compliance implications

Non-compliance could affect the College's ability to conduct business, respond to requests for information, be transparent and accountable, and ensure confidentiality and privacy of personal information. This would be a risk to the College both financially and to our reputation in the community.

9. Communications plan

- A message will be posted on ICE alerting employees when new or revised policies and procedures are added to ICE.
- The Records Manager will include the policy & procedure as part of all training resources related to Electronic Imaging and Document Management.

10. Related forms, legislation or external resources

- Durham College Common Records Schedule
- CAN/CGSB-72.34-2017 Electronic Images as Documentary Evidence
- Personal Information Protection and Electronic Documents Act