



A culture of recognition and mutual respect where the MRSA is an equal and valued partner in the MRU community.

| Records Retention and Privacy Policy | |
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| First draft: Fall 2022 | Sponsor: Governance Committee |
| Current Version: 1.01 | |
| Last Amended: N/A | Approved by: MRSA Executive Board by plurality vote on December 14, 2022 |
| Next Review: March 2024 | |

Overview

This policy applies to all MRSA internal documents and records for business operations and administration for the Executive, Staff and Committees.

Purpose

This policy provides direction and principled guidance for the collection, retention, protection, use and disclosure of all records and information, including personal private information which the MRSA maintains of members and employees, and in compliance with the *Personal Information Protection Act (PIPA)*, *Health Information Act (HIA)* and the *Labour Relations Code (LRC)*.

General Operational and Administrative Records:

1. All records that have a foundational purpose shall be maintained in perpetuity.
2. All records that influence the democratic processes, policies, and business decisions of the MRSA shall be maintained in perpetuity.
3. All financial records shall be maintained as per Canada Revenue Agency requirements and in accordance with Generally accepted accounting practices (GAAP).

Approved: v1.01 December 14, 2022 by the MRSA Executive Board



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4. All other records shall be maintained in accordance with the MRSA Records Management Schedule.

Personal member and employee information shall be safeguarded by:

1. Placing all physical records containing personal information in files and stored in cabinets which are to be locked outside of the normal business hours, or during such time where there are no authorized employees or authorized elected officials of the MRSA present.
2. All computer records shall be stored on computers which are password protected and all such reasonable methods as may be possible shall be taken to safeguard those computer records.
 - a. Electronic records are to be saved to the designated secure cloud server services that MRSA has designated as appropriate for that type of record. Electronic records should not be saved on laptops or other mobile electronic devices.
3. Backup computer information shall be safeguarded in secure encrypted storage at the MRSA's Sync account.
4. Any external data storage utilized by the MRSA shall ensure all security measures required by applicable privacy legislation are met.

Records Retention:

MRSA recognizes the need to balance the requirement for ongoing retention of files for effective member representation, with the need to safeguard personal member information. As a result, retention of such information shall be governed by the following guidelines:

1. Records containing personal member information that has been collected by the MRSA shall be retained in accordance with this policy for the duration of time that the member is employed within the MRSA bargaining unit, except as otherwise provided for by this policy.
2. Physical files containing personal member information that have been collected by the MRSA for the purpose of representation shall be destroyed for members no longer employed within the MRSA bargaining unit and the case file has been closed for two (2) years.
3. Member contact information and records of labour relations matters may be retained electronically in the MRSA's password-protected labour relations database (Sumac) for labour relations and statistical purposes.
4. Where it is reasonable to anticipate that personal-identifying information may be required past five years (i.e. when there may be a legislated requirement such as occupational injuries, or when



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a Settlement Agreement contains obligations that extend beyond a member's employment relationship with the University), secured files may be retained indefinitely in accordance with this policy.

5. Computers in custody and control of MRSA, which are no longer in use, shall have a factory reset and all data removed as soon as practicable.
6. Destruction of all files including paper files and audio and visual materials shall be by shredding or by other methods that ensure the proper and complete destruction of such files.

Collection and Use:

1. The MRSA can collect, maintain and use personal information of the membership in accordance with and as required by the *LRC* and *PIPA*.
2. The MRSA will only use information for necessary and lawful purposes in exercising its proper business and legislated responsibilities.

Privacy Concerns and Complaints:

1. Where any MRSA member or a MRSA employee has a concern with the collection, use, disclosure, or retention of personal information they are encouraged to first inquire with the MRSA office for clarification.
2. Should a MRSA member or a MRSA employee have a complaint regarding the collection, use, disclosure, or retention of personal information they may lodge a complaint with the Privacy Officer of the MRSA.
 - a. Upon receipt of a complaint, the Privacy Officer will review the complaint to ascertain if there is any breach or improper use of personal information.
 - b. Should it be found that there was a breach or improper use of personal information, the Privacy Officer will take appropriate action, in accordance with *PIPA*, to rectify the situation and inform all concerned parties, including the member.
3. Should a MRSA member or a MRSA employee provide notification of rescindment of consent of collection, use, disclosure of retained personal information, including personal health information as per the *HIA*, the MRSA will take action to confirm removal/destruction of all information, if consent can be rescinded from that individual if possible and appropriate. Should the MRSA continue to have rights to retain such information in accordance with legislation, then the individual will be advised, with reasons provided.



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4. Should a MRSA member or a MRSA employee request to obtain a copy of retained personal information, the MRSA will provide all documentation that the individual has rights to obtain as per the *LRC*, and within the time limits as set out in PIPA.

| Version Number | Date Approved | Approved By | Description |
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| 0.1 | | MRSA Executive Board | To create a records and retention policy for the Association. |

Related Documents

[Records Management Schedule](#)