



POLICY NAME: RECORD MANAGEMENT POLICY

Date	Action
March 29, 2021	Approved by the Board of Directors
April 26, 2021	Policy amendment approved by the Board of Directors

SCOPE

This Policy establishes a framework for record management at The Couchiching Conservancy (CC).

It applies to all records created by the Board of Directors, staff, contract workers & volunteers of CC. It governs how and when organization, financial, land transaction and stewardship records are created, collected, accessed, retained, stored and destroyed.

The key requirements of this policy include:

- Identifying significant records and creating and keeping proper and adequate records of CC’s business activities to ensure sufficient evidence of its performance of those functions;
- Retaining and disposing of records in accordance with approved retention and disposal schedules; and
- Supporting record management programs with clear policies and procedures.

DEFINITIONS

Back-up record: an exact copy of an original file taken and stored on another medium elsewhere so that it may be used to restore the original

Digital records: any record that has been saved in a digital (electronic) format. This may include scanned copies of Conservation Easement Agreements, Baseline Documentation Reports, digital photographs or email.

External hard drive: device which stores digitally encoded data and is designed for large storage capacity.

Irreplaceable documents: type of document that cannot be or is difficult to replace. This may include, but is not limited to, documents such as personnel records, Canada Revenue Agency (CRA) letters and rulings, Conservation Easement Agreements, and other documents that require landowner signature and consent, such as Baseline Documentation Reports.

Record: recorded information in any form, including data in computer systems, created or received and maintained by an organization or person in the transaction of business, and kept as evidence of, and support for, the organization's business activities and the good conduct of its affairs.

GENERAL STANDARDS

1. This policy supersedes all previous CC Record Management Policies, which are now considered to be rescinded (e.g., CC Record-Keeping Policy, 2008).
2. This policy will comply with all applicable legislation related to record management within Land Trusts.
3. This policy incorporates current best practice standards and complies with all the requirements of the Canadian Land Trust Alliance's *Canadian Land Trust Standards and Practices* (2019) with particular attention to the following:
 - a) **Standard 3 - Board Accountability:** by adopting written policies or procedures for the responsible and prudent investment, management, and use of financial assets.
 - b) **Standard 6 - Financial Oversight:** by keeping financial records in accordance with *Generally Accepted Accounting Principles* and where applicable, CRA requirement, and by establishing written internal controls and accounting procedures, including segregation of duties to prevent the misuse or loss of funds.
 - c) **Standard 8 - Evaluating and Selecting Conservation Projects:** by creating written agreements when engaging in a partnership on a joint acquisition or a long-term stewardship project or when co-holding conservation agreement, create written agreements to clarify:
 - i. the goals of the project;
 - ii. the roles and responsibilities of each party;
 - iii. legal and financial arrangements; and
 - iv. communications to the public and between parties.

- d) **Standard 9 - Ensuring Sound Transactions:** by adopting the following record keeping practices:
 - i. Adopt a written records policy that governs how and when organization and transaction records are created, collected, retained, stored and destroyed.
 - ii. Keep originals of all documents essential to the defense of each real property transaction in a secure manner and protected from damage or loss.
 - iii. Create and keep copies of these documents in a manner such that both originals and copies are not destroyed in a single calamity.
 - e) **Standard 11 - Conservation Agreement Stewardship** by creating and adopting a:
 - i. Baseline and Documentation Report;
 - ii. Written policy for compliance monitoring of conservation agreements;
 - iii. Written policy for maintaining a permanent record of all notices approvals, denials, interpretations and the exercise of any significant permitted rights.
4. Any record created or received by an employee, board member or contract staff belongs to CC and not the individual.
 5. This policy applies to all aspects of CC activities and incorporates hard copy and digital records.
 6. This policy outlines the management of all secured documents to ensure that they will not succumb to fire, flooding, mold, deterioration, theft or tampering.
 7. CC recognizes that maintenance of consistent, complete, secure, and authentic records is essential to achievement of its mission.

POLICY

1. ACCESS TO RECORDS

- 1.1. CC staff may access records depending on the relevance of the records to the performance of their responsibilities, privacy considerations, and other specific considerations where confidentiality may restrict the access to records. Authorization to access these records may be granted by the Executive Director, or their delegate.
- 1.2. Staff is not permitted to give access to CC records to unauthorized persons or agencies, especially when relating to species at risk and personnel records.
- 1.3. CC must disclose records to authorized agencies for processes such as audits. Request for confidential documents must be made in writing.

- 1.4. CC records must remain available and accessible when needed for administrative requirements, daily work-related tasks or accountability requirements.

2. RETENTION, STORAGE AND DISPOSAL OF RECORDS

- 2.1. CC's irreplaceable documents (see Definitions Section) will be stored in a secured manner on-site, protected from damage or loss (e.g., fireproof container).

- a) Irreplaceable documents will also be scanned and transferred into a digital record management system. These digital records will be kept on the Executive Director's computer and/or the shared server. A back-up record will be stored on the external hard drive. Additional details, including record type and duration, are identified in Section 3. Types of Documents.

- b) For Fee-simple Properties and Conservation Easement Agreements, critical documents will be stored in a fireproof container. The critical documents for Fee-simple Properties and Conservation Easement Agreements are:

- Property Title;
- Title Insurance;
- Agreement of Purchase and Sale (between donor and CC; executed by both);
- Registered Transfer;
- Parcel Register (showing the Transfer was certified);
- CC's Lawyer's Report Letter;
- Surveys or Reference Plans (that are referred to in the legal description);
- Correspondence from CC's Lawyer regarding title or off title issues.
- Correspondence from the Donor's Lawyer confirming donor satisfaction with the form of the Transfer, or if changes were requested;
- Reports e.g., those used to justify acceptance of the donation;
- Appraisal Reports (used for Tax Receipt purposes);
- Any declarations signed by the Donor e.g., Declaration of Possession; and
- HST Certificates for exemption (all or part of the property).

All documents relevant to Fee-simple Properties must be kept on file and in a secured location until seven (7) years after either a) the property has been transferred, or b) the property has been sold.

Documents related to Conservation Easement Agreements must be kept for the duration of the easement, and must be accessible for the yearly monitoring reports and updates to the property. Easement records must identify any changes in landowner or land uses.

- 2.2. The office computers will be linked together on a system network. This will enable each computer access to a single external hard drive. At the end of each week, at a minimum,

each staff member working on a computer will store their documents to the external hard drive. The external hard-drive will rotate weekly and will always be kept off-site, at the residence of the Executive Director, with the office accountant, or with a full-time employee.

- 2.3. All staff will be responsible for the management of their day-to-day lower priority files.
- 2.4. Contract information, except contracts related to property transactions as listed in section 3.3, will be kept for the duration of the contract, and an additional seven (7) years.
- 2.5. Records, such as tax-related information, will be kept for the duration specified for each government agency (e.g., CRA 7 years) or grant donor (variable).
- 2.6. Records of credit card information will not be retained and will be disposed of or made illegible immediately after being used for the purpose intended by the card-holder.
- 2.7. Records with no value may be destroyed or recycled at any time. These records only need to be retained for a very limited period of time and include announcements of social events, leaflets, flyers, and copies or extracts of documents sent only for reference.
- 2.8. Where the official version of a record is verified as already being maintained in CC's record management system a copy may be destroyed at any time.
- 2.9. All digital photograph records will be transferred to the external hard drive.
- 2.10. Destruction of physical or digital records will be shredded and/or deleted as outlined above or within Section 3.
- 2.11. CC will request digital copies of documents (i.e., deliverables as part of contracts), such as for appraisals and surveys.
- 2.12. Each property owned or managed by CC will have a checklist which will identify that each of the records required for property management is available. This checklist will also include the location of the document if not in the property folder.

3. TYPES OF DOCUMENTS

All types of documents foreseen to be managed by CC are listed below. The management of each group of documents has been outlined, as well as the length of time each group should be kept.

3.1. Organizational Records

The following organizational records shall be scanned, if necessary, and saved onto the external hard drive. The working files (e.g., drafts) will be stored in an easy to access manner, such as within the office files. These documents will be kept in perpetuity, with the exception of those noted by an asterisk that will be disposed of as required.

- Incorporation documents
- By-laws
- Board records and minutes
- Policies and procedures
- Insurance documents
- Charitable status documentation
- Personnel and/or Personal Records*
- Significant correspondence (including email)*
- History of the organization
- CRA's Charitable Information Return.

3.2. Financial Records

The working files of these documents (until end of fiscal year) will be maintained in a secure location on-site. Until financial records have been stored in QuickBooks, or a similar digital storage system, the records should be stored in a secure location. Once an electronic copy exists, the paper copy can be accessibly and securely stored on-site until the year's end. After the year-end, the documents will be stored on-site and will be kept for 7 years (see Section 2.5).

- Membership records (history, solicitations, pledges, donations, relationships)
- Accounting records
- Annual reports
- Audits
- Bills
- Cheque stubs
- Donation records
- Financial Grants
- CRA rulings, letters.

3.3. Land Transaction Records

The following land transaction records shall be stored in a secured manner. The paper copies will be stored securely on-site once the document has been scanned. These documents will only be destroyed if the property is no longer part of CC's portfolio (see section 2.1 b)).

- Deeds
- Conservation Easement Agreements
- Contracts
- Closing papers
- Title policies
- Leases
- Appraisals

- Ecological Gifts documentation
- Environmental audits
- Site Inspections
- Significant letters and correspondence.

3.4. Stewardship Records

The following stewardship records shall be scanned where necessary (documents with signatures), and stored on the external hard drive. These documents will be kept in perpetuity, with the exception of those noted by an asterisk that will be disposed of as required, or as outlined in section 2.1 b).

- Baseline Documentation Reports
- Monitoring Reports
- Species Data (e.g., species at risk, natural heritage information)
- Management Plans
- Biological Inventories
- Violations
- Amendments
- Land Surveys
- Splits and changes in ownership
- Correspondence with landowners
- Digital photograph records
- Signs*
- Maps*.