Records Management and Retention Policy

1 PURPOSE

This policy establishes the framework for the creation, maintenance, security, retention, and disposal of institutional records to ensure legal, regulatory, and operational compliance. It supports:

- Compliance with the Private Training Act and Private Training Regulation;
- Requirements under the Fees and Student Tuition Protection Fund Regulation;
- EQA designation standards for institutional quality assurance and international student supports;
- Institutional transparency, accountability, and risk mitigation.

2 SCOPE

This policy applies to all records created, received, or maintained by the Canadian National Institute of Business (CNIB) in the course of academic, administrative, operational, or financial activities, whether in physical or digital format. This includes records related to:

- Student enrolment, attendance, and academic performance
- Program approval and delivery
- Instructor qualifications
- Tuition and refund transactions
- Governance and compliance
- International student management
- Archived records as required under PTIB regulation

3 DEFINITIONS

Record: Any document, file, email, form, report, or data that serves as evidence of institutional activity.

Official Record: A record that must be retained per regulatory requirements or institutional policy.

Retention Schedule: A timeline defining how long specific types of records must be kept before being securely disposed of or archived.

Student Record: Records related to student admission, enrolment, tuition, attendance, progress, assessment, and credentialing.

Archived Record: A student record maintained for long-term storage to meet regulatory retention obligations.

4 POLICY STATEMENTS

4.1 Records Creation and Maintenance

4.1.1 All departments must maintain accurate and complete records aligned with the institution's approved policies, procedures, and regulatory obligations.

4.1.2 Records must be created at the time of transaction or activity and securely stored in approved systems.

4.1.3 Electronic records must be backed up regularly and protected by appropriate cybersecurity measures.

4.2 Retention Requirements

4.2.1 CNIB adheres to the minimum records retention standards as prescribed under Section 37–39 of the Private Training Regulation and corresponding policy manuals.

4.2.2 The following retention periods apply:

Record Type	Minimum Retention Period	Regulation Reference
Student enrolment contracts	8 years	PTR s. 37(2)
Student transcripts / final grades	50 years	PTR s. 38(1)
Tuition and fee payment records	8 years	PTR s. 37(2)
Instructor and staff qualifications	8 years after employment ends	PTR s. 20
Attendance and progress records	8 years	PTR s. 37(2)
Archived student records (after closure or loss of certification)	Indefinitely or as directed by the registrar	PTR s. 39
Marketing and agent agreements	6 years after end of use	EQA Code of Practice
Complaint and dispute resolution records	8 years	PTR s. 62
Governance meeting minutes	8 years	Institutional best practice

4.3 Archived Records

4.3.1 CNIB will ensure archived records are accessible and maintained in accordance with PTIB directives, particularly in cases of program closure or institutional wind-down.

4.3.2 Backup copies of archived student transcripts and final grades must be stored securely and off-site (or in cloud-based environments meeting Canadian privacy laws).

4.4 Record Disposal

4.4.1 Records must be disposed of securely once the retention period has expired.

4.4.2 Physical records must be shredded or incinerated; digital records must be permanently deleted using secure erasure methods.

4.4.3 Disposal must be documented, including record type, date, and responsible party.

5 ROLES AND RESPONSIBILITIES

Role	Responsibilities
Registrar / SEA	Ensure regulatory compliance with record-keeping standards
Compliance Officer	Maintain institutional retention schedule, perform audits
Department Heads	Ensure records are created, classified, and stored appropriately
IT Department	Manage secure digital storage, access controls, and backups
All Employees	Follow record-keeping procedures and report breaches or errors

6 PRIVACY AND SECURITY

- Records must be managed in accordance with the Personal Information Protection Act (PIPA).
- Access to student or sensitive records is limited to authorized personnel.
- Institutional systems must include role-based access control, encryption, and regular audit logs.

7 TRAINING AND COMPLIANCE

- All staff must complete annual training on proper records management practices, including digital security, retention periods, and privacy compliance.
- Internal audits will be conducted at least once per year to verify compliance.

8 RELATED DOCUMENTS AND LEGISLATION

- Private Training Act (S.B.C. 2015, c.5)
- Private Training Regulation (B.C. Reg. 153/2016)
- Fees and Student Tuition Protection Fund Regulation (B.C. Reg. 140/2016)
- EQA Policy and Procedures Manual (2025)
- Personal Information Protection Act (PIPA)
- CNIB's Dispute Resolution and Enrolment Policies

9 APPROVAL AND REVIEW DETAILS

Version	Date	Approved by	Comments/Changes	Status
V0.1	21/03/25			Draft

Appendix A

Record Category	Record Type	Minimum Retention Period	Applicable Reference / Notes
Student Records	Student enrolment contracts	8 years	PTR s. 37(2); includes addenda, withdrawal/dismissal notices
	Student transcripts / final grades	50 years	PTR s. 38(1); must include student's name, program, dates, final mark
	Attendance records	8 years	PTR s. 40; required for all approved programs
	Progress assessments / grades	8 years	PTR s. 37(2); includes exams, assignments, evaluations
	Tuition & related fee payments	8 years	PTR s. 37(2); includes payment schedules, refunds, receipts
	Dispute resolution records	8 years	PTR s. 62; must include complaint details, outcome
	Dismissal or withdrawal notices	8 years	PTR s. 47 & 46
	Work experience agreements & evaluations	8 years	PTR s. 41
Instructor & Staff Records	Instructor qualifications	8 years after employment ends	PTR s. 21(2)
	Employment agreements & performance reviews	8 years after employment ends	Institutional best practice
	SEA qualifications	8 years after term ends	PTR s. 22.1
Institutional Administration	Governance meeting minutes	8 years	Board, PAC, management, QA committee
	Program advisory committee (PAC) minutes	8 years	PTR s. 19
	Compliance audits & inspection reports	8 years	PTR, EQA Policy Manual
	Institutional risk assessments	8 years	Institutional best practice
	Strategic/business plans	8 years	Required for PTIB & EQA applications
Financial Records	Annual financial statements	8 years	PTR s. 51; includes auditor reports
	Invoices, payroll, receipts	8 years	CRA & institutional standards
Marketing & Recruitment	Agent contracts & evaluations	6 years after termination	EQA Code of Practice
	Marketing materials	6 years	Must reflect actual services & program outcomes
Archived Records	Student transcript backups	Indefinite	PTR s. 38(2); secure off-site or cloud backup
	Student records post-closure or loss of certification	As directed by Registrar	PTR s. 39; may require transfer to Ministry