



TITLE

TRANSITORY RECORDS

SCOPE

Provincial

DOCUMENT #

1133-03

APPROVAL AUTHORITY

Corporate Services Executive Committee

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SPONSOR

Health Information Management

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Records Management Policy (#1133)

SCHEDULED REVIEW DATE

October 16, 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.

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OBJECTIVES

- To establish how **transitory records**, regardless of media, are managed within Alberta Health Services (AHS).
- To ensure transitory records are not unnecessarily retained by AHS.

APPLICABILITY

Compliance with this document is required by all Alberta Health Services employees, members of the medical and midwifery staffs, Students, Volunteers, and other persons acting on behalf of Alberta Health Services (including contracted service providers as necessary).

ELEMENTS

1. Identifying and Managing Transitory Records

- 1.1 All individuals creating or collecting records managed by AHS are responsible for identifying and managing transitory records in accordance with this Procedure.
- 1.2 Transitory records shall not be:
 - a) coded or processed using records classification systems or the AHS *Records Retention* Schedule;
 - b) preserved in an **official records** keeping system; or
 - c) retained beyond their usefulness.

- 1.3 Where multiple copies of records are generated, the business owner accountable for maintaining the official record shall be identified. All other copies may be treated as transitory providing the record has no future business, financial, legal, research, or archival value.
- 1.4 Approval for the **destruction** of transitory records is not required.
- 1.5 The transfer or destruction of transitory records shall not be documented in the *Records Retention Schedule*.
- 1.6 Physical transitory records due for destruction shall be placed in a **secure** location prior to destruction (e.g., locked shredding bins, boxes, cabinets, or file rooms) and clearly labelled. Electronic transitory records can be deleted once the usefulness or value has expired.
- 1.7 Records shall be destroyed by making them unreadable. Appropriate methods for destroying:
- a) paper records include incinerating, shredding, pulping, and pulverizing by an AHS- approved third party destruction service provider;
 - b) electronic records is through regular deletion; and
 - c) physical storage media other than paper include pulverizing, incinerating, or granulating by an AHS-approved third party destruction service provider.
- 1.8 The confidentiality and security of health, personal, or third-party information contained within transitory records shall be protected in accordance with applicable legislation, regulations, and AHS policy.
- 1.9 Official records converted to a different format or media are considered **source records** and may be destroyed provided that all applicable records management policies and procedures have been followed with respect to **conversion** to the new format.

2. Transitory Records Subject to a Legal Hold

- 2.1 Destruction of transitory records shall not commence, or shall cease with knowledge of, or notification of a **legal hold**.

DEFINITIONS

Conversion means process of changing records from one format to another while maintaining the characteristics of the record. (ISO 13008:2012)

Destruction means the disposal of records by incineration, maceration, pulping, granulating, shredding, or otherwise with the objective of obliteration beyond any possible reconstitution.

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 the *Legal Hold Procedure*.

Official record means the instance of a record that has the force of an original record and is authoritative, final, and complete.

Secure means a condition in which reasonable security measures are in place to protect against risks such as unauthorized access, use, disclosure, modification, and/or destruction of the information.

Source record means the original record that was digitized to create an electronic official record.

Transitory Record means records that do not need to be retained to meet operational, legal, regulatory, fiscal or other requirements. Transitory records do not document 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 AHS.

REFERENCES

- Alberta Health Services Governance Documents:
 - *Electronic Records Conversion and Migration Recordkeeping Procedure* (#1133-05)
 - *Records Management Policy* (#1133)
 - *Record Retention Schedule* (#1133-01)
 - *Legal Hold Procedure* (#1133-04)
 - *Privacy Protection and Information Access Policy* (#1177)
- Alberta Health Services Resources:
 - Access & Disclosure (Health Information Management): disclosure@ahs.ca
 - Information and Privacy: privacy@ahs.ca
 - Records & Information Management (RIM): RIM@ahs.ca
 - Whistleblower Line (Confidential): 1-800-661-9675
- Non-Alberta Health Services Documents:
 - *Freedom of Information and Protection of Privacy Act* (Alberta)
 - *Health Information Act* (Alberta)
 - *Information and documentation* – Electronic records conversion and migration process [ISO 13008:2012(E)] (International Organization for Standardization)

VERSION HISTORY

Date	Action Taken
October 16, 2019	Revised
Click here to enter a date	Optional: Choose an item