

UNIVERSITY OF MANITOBA PROCEDURE

Procedure:	IMAGING RECORDS FOR USE AS OFFICIAL RECORDS
Parent Policy:	Records Management Policy
Effective Date:	June 23, 2015
Revised Date:	
Review Date:	June 23, 2025
Approving Body:	Vice-President (Administration)
Authority:	Records Management Policy
Responsible Executive Officer:	Vice-President (Administration)
Delegate:	
Contact:	Access and Privacy Officer
Application:	All Supervisors

Part I Reason for Procedure

- 1.1 The University of Manitoba recognizes that Imaging or digitization of paper Records offers the potential to enhance workflow and improve office processes. If the intent of the Imaging Program is to have the digital images replace the original source (or paper) document, certain requirements must be met to ensure the image is authentic and admissible in a court of law. These Procedures outline the minimum requirements that must be established to ensure that Imaging Programs established at the University of Manitoba ensure the authenticity and preservation of the digital image as the official Record.

The University of Manitoba also recognizes that various units or departments may wish to implement their own Imaging Programs to meet their individual needs. An Imaging Program refers to the Policies and Procedures developed to process and manage the Records, as well as the Electronic Records Management System that is used to access and store the Records. The University authorizes the creation and implementation of Imaging Programs that meet the minimum requirements outlined in these Procedures and have followed the approval process outlined in the guidelines that support these Procedures.

1.2 Relevant National and International Standards

- (a) *CAN/CGSB-72.34-2005, Electronic Records as Documentary Evidence*
- (b) *ISO 15489, Parts 1 and 2; Information and Documentation – Records Management*

Part II Procedural Content

2.1 Scope of these Procedures: These Procedures apply to paper source documents approved for capture into Electronic Records Management Systems, where the intent is for the digital image to replace the original source document. These Procedures do not apply to Imaging Programs implemented to back up vital Records or enhance access to Records where the paper original will continue to be retained and considered the original copy.

2.2 Definitions

- (a) **Audit Trail** means the chronological Record of system activities that is sufficient to enable the reconstruction, reviewing and examination of the sequence of environments and activities surrounding or leading to an operation, procedures, or an event in a transaction from its inception to final results.
- (b) **Authentic** (in evidentiary proceedings) means the genuineness of a Record, which in turn means the validity or authority of its authorship. It requires proof that a Record is what it purports to be (i.e. that a Record actually comes from the person, organization or other legal entity asserting to be its author or authorizing authority).
- (c) **Evidence** means information contributing to the proof of a fact.
- (d) **Electronic Records Management System (ERMS)** means the electronic content management system primarily designed to assist an organization in managing its Recorded Information concerning its record-keeping practices from inception to disposition of Records. The system includes a means to demonstrate that procedures are in place to maintain the integrity and the authenticity of electronic Records. Also sometimes known as an Electronic Data and Records Management System (EDRMS).
- (e) **Imaging** means to copy or capture a Record that can be used to generate an intelligible reproduction of that Record.
- (f) **Imaging Program** means a program established to scan or image paper Records into an Electronic Records Management System or repository.

The Program encompasses the procedures, actions and software required to establish an image repository that is reliable and authentic.

- (g) **Indexing** means the process of establishing access points to facilitate retrieval of records or information or both.
- (h) **Life Cycle** (of records) means the stages in the life cycle of Records include, but are not limited to, its planning, creation and organization; the receipt and capture of the data; the retrieval, processing, dissemination and distribution of data; its storage, maintenance and protection; the archival preservation or destruction.
- (i) **Metadata** refers to data about data elements, including but not limited to data descriptions; and data about data ownership, access paths, access rights and data volatility describing Records, records system, documents or data.
- (j) **Procedures Manual** (for Records Management) means the source of instruction and reference for the personnel responsible for creating, preparing, processing, storing and disposing of Records.
- (k) **Record or Recorded Information** means a Record of information in any form, including information that is written, photographed, recorded, or stored in any manner, on any storage medium, or by any means, including by graphic, electronic or mechanical means, in the custody or under the control of the University of Manitoba.
- (l) **Source Record** means the original Record containing information or data entered into an ERMS.

2.3 Responsibilities

- (a) Each University Office that establishes an Imaging Program must submit a proposal for Imaging to the Access and Privacy Office for review and acceptance. In this proposal, they are responsible for ensuring that their procedures and Records Management Systems meet the requirements for the imaged Records to be considered Records in a court of law, and that all other internal or external requirements applicable to the Records are met. It is the responsibility of each University Office establishing the Imaging Program to ensure that all applicable legislation is complied with in their proposed plan.
- (b) The Access and Privacy Office is responsible for reviewing all Imaging Programs and ensuring they are compliant with *CAN/CGSB -72.34-2005, Electronic Records as Documentary Evidence*, privacy considerations, relevant external regulations and legislation, and internal Records retention requirements.

- (c) Should the Imaging Program incorporate the Imaging of any Records that are archival, the Access and Privacy Office will engage Archives and Special Collections in the review process. Archives shall review the Imaging Program to determine if the system and captured Records meet their standards for the preservation of electronic images. If archival standards cannot be met, Archives and Special Collections reserve the right to request the transfer of the original source Records to the archives for permanent preservation.

2.4 Minimum Requirements for an Imaging Program

- (a) Authorization to implement an approved Imaging Program from the Records owner/information owner for the department or faculty.
- (b) Designation of an individual in a senior management role that is responsible for the Imaging Program.
- (c) Written procedures describing processes for:
 - (i) Description of the Records that are to be included in the project
 - (ii) Data capture (paper preparation and scanning)
 - (iii) Indexing and retrieval
 - (iv) Quality control
 - (v) Procedures for retaking images that did not meet quality assurance standards
 - (vi) Storage and disposal of source documents
 - (vii) Disposal of images
 - (viii) Storage, back-up and recovery processes for images
 - (ix) Security
 - (x) Auditing
- (d) Operations Manuals for:
 - (i) Hardware, software and network elements
 - (ii) Format, resolution and quality standards for images
 - (iii) Monitoring and maintenance of system
 - (iv) Trouble logs, and procedures to ensure ongoing integrity of system

- (v) System change and upgrade
- (e) Information security measures, including the establishment of user system access profiles.
- (f) Tamper proof audit log for additions and modifications to the images and system.
- (g) Ability to recover from back-up media.
- (h) Ability to dispose/purge images at the end of the retention time.
- (i) Preservation of life-cycle metadata.
- (j) Electronic Records Management System compliant with current international standards.

2.5 Outsourcing

- (a) If the University Office decides to outsource the creation of the images, they are responsible for ensuring that the vendor selected has processes and procedures in place that are compliant with the current edition of *CAN/CGSB-72.34-2005, Electronic Records as Documentary Evidence*, and must maintain documentation outlining their procedures as outlined in Section 2.4 of these Procedures, and include a description of the process of how Records are transmitted to the vendor, the vendors procedures and how the images and source documents are transferred back to the University. The vendor may be required to comply with *The Personal Health Information Act Regulations* (PHIA) relating to PHIA Training and signing of the University of Manitoba Pledge of Confidentiality if the Records contain Personal Health Information.
- (b) The Access and Privacy Office, in addition to the Office of Legal Counsel shall be required to review and approve the service contract with the vendor in accordance with the Signing of Agreement Policy.

Part III Accountability

- 3.1 The Office of Legal Counsel is responsible for advising the Vice-President (Administration) that a formal review of these Procedures is required.
- 3.2 The Vice-President (Administration) is responsible for the communication, administration and interpretation of these Procedures.
- 3.3 Vice-President (Administration) is responsible for complying with these Procedures.

Part IV Review

- 4.1 Governing Document reviews shall be conducted every ten (10) years by the Vice-President (Administration). The next scheduled review date for these Procedures is June 23, 2025.
- 4.2 In the interim, these Procedures may be revised or repealed if:
- (a) the Vice-President (Administration) or Approving Body deems it necessary or desirable to do so;
 - (b) these Procedures are no longer legislatively or statutorily compliant;
 - (c) these Procedures are now in conflict with another Governing Document; and/or
 - (d) the Parent Policy is revised or repealed.

Part V Effect on Previous Statements

- 5.1 These Procedures supersede all of the following:
- (a) all previous Board of Governors/Senate Governing Documents on the subject matter contained herein; and
 - (b) all previous Administration Governing Documents on the subject matter contained herein.

Part VI Cross References

- 6.1 These Procedures should be cross referenced to the following relevant Governing Documents, legislation and/or forms:
- (a) [Records Management Policy](#)
 - (b) [Records Holds Procedure](#)
 - (c) [Transitory Records Procedure](#)
 - (d) [Access and Privacy Policy](#)
 - (e) [Canada Evidence Act](#)
 - (f) [The Manitoba Evidence Act](#)

- (g) *CAN/CGSB-72.34-2005, Electronic Records as Documentary Evidence*
- (h) *ISO 15489, Parts 1 and 2; Information and Documentation – Records Management*