

Policy and Procedure

Title:	Retention of Non-Medical Records	
Policy Number:	06.013	Section: Information Management
Effective Date:	January 3, 1995	
Revised Date:	September 14 2023	
Approving Body:	President and Chief Executive Officer of CancerCare Manitoba (CCMB)	
Authority:	<i>The Health System Governance and Accountability Act (Manitoba)</i>	
Policy Contact:	CCMB Privacy Officer	
Applicable to:	All CCMB Corporate and Clinical Staff	

1.0 BACKGROUND:

- 1.1** The Regulations to *The Personal Health Information Act* (Manitoba) (PHIA) requires trustees to establish and comply with written policies and procedures containing provisions for the security of personal health information during its collection, use, disclosure, storage, and destruction.

2.0 PURPOSE:

- 2.1** To ensure guidelines are established for the retention of administrative and business records for all Operations within CancerCare Manitoba (CCMB) including Departments, Programs and Services.
- 2.2** To comply with *The Freedom of Information and Protection of Privacy Act* ("FIPPA") provisions respecting the right of access to records in the custody or under the control of public bodies and set out rules which must be followed by public bodies respecting the collection, use, protection, retention and disclosure of personal information.
- 2.3** To comply with PHIA provisions respecting the right of access by an individual to his or her own personal health information held by a trustee and to set out rules which must be followed respecting the collection, use, protection, retention and disclosure of personal health information.

3.0 DEFINITIONS:

- 3.1 Non-Medical Records:** All records created or maintained in any form, including an electronic form, by CancerCare Manitoba, but not including patient/client records.
- 3.2 Permanent Files:** Non-medical records which have been identified as having enduring value.

4.0 POLICY:

- 4.1** CCMB Senior Leaders and Department, Program and Services leaders are responsible for record and file management activities, maintaining, protecting and disposal within all clinical and administrative areas under their authority.

CANCERCARE MANITOBA GOVERNING DOCUMENTS Policy and Procedure	
Title: Retention of Non-Medical Records	Policy No. 06.013
Page: 2 of 6	

- 4.2** CCMB Senior Leaders and Department, Program and Services leaders shall ensure that measures are taken to guarantee Non-Medical Records are maintained, archived or disposed of properly (including sufficient budget to manage).
- 4.3** All areas within CCMB (e.g. Departments, Programs, Services, and sites) shall have a written schedule regulating the retention and destruction of Non-Medical Records.

The Retention of Non-Medical Records Schedule (see **Appendix A**) is not an exhaustive list, therefore, each Operation, Department, Program and Service may add to the Schedule, as required.

The Schedule shall:

- 4.3.1** Subject to Section 5.0, establish a minimum retention period for records based on legal, administrative and finance requirements, recognizing that each area may wish to keep certain records for a longer period of time.
- 4.3.2** Ensure that Permanent Files are identified and moved into an archival environment, when their office retention period is finished.
- 4.3.3** Encourage the systematic and controlled destruction of Non-Medical Records after expiry of the established retention periods.

5.0 PROCEDURE:

- 5.1** Minimum retention and destruction periods for clinical and administrative records are set out in the accompanying Retention of Non-Medical Records Schedule (see **Appendix A**), whether paper or electronic, shall be adhered to by all areas within CCMB.
- 5.2** All other information request and disclosures must be vetted through the appropriate programs/departments (e.g.) Legal, Finance, Communications, etc.) regardless of their sensitivity classification.

6.0 REFERENCES:

- 6.1** Shared Health - Retention of Office Records – Policy #301.140.102
[340.140.102 - Retention of Office Records \(sharedhealthmb.ca\)](https://www.sharedhealthmb.ca/340.140.102-Retention-of-Office-Records)
- 6.2** *The Personal Health Information Act* (Manitoba)
<https://web2.gov.mb.ca/laws/statutes/ccsm/p033-5.php?lang=en>
- 6.3** *The Freedom of Information and Protection of Privacy Act* (Manitoba)
<https://www.gov.mb.ca/fippa/index.html>

CANCERCARE MANITOBA GOVERNING DOCUMENTS Policy and Procedure	
Title: Retention of Non-Medical Records	Policy No. 06.013
Page: 3 of 6	

7.0 **APPENDIX**

7.1 Appendix A – Retention of Non-Medical Records Schedule

Documentation:	
1.	The original signed and approved document is on file in the Policy Office, CCMB.
2.	The e-copy is on file in the CCMB Governing Documents Library on SharePoint.

Revision History:				
Date	Version	Status	Author	Summary of Changes
03/01/1995	1	Initial		
15/02/2011	2	Minor Revision		Did not go through approval process.
21/02/2013	3	Minor Revision	Leslie Costa	
25/06/2015	4	Minor Revision	Leslie Costa Policy Team	Policy revised and adapted to reflect WRHA Policy; policy name changed.
05/04/2018	4	Minor revision	S.Friedenberger	Reformatted to new template
16/08/2023	4	Minor revision	C. Slusky	Updated delegate and contact information and links to policies and reference

Executive Sponsor: This Policy was approved/endorsed by:	
Date	Name / Title
September 14, 2023	Brent Gibson, Chief of Corporate Services and Finance

Approved by:		
Date	Name / Title	Signature
September 14, 2023	Dr. Sri Navaratnam, President and Chief Executive Officer, CancerCare Manitoba	<i>"Original signed by Dr. Sri Navaratnam"</i>

CANCERCARE MANITOBA GOVERNING DOCUMENTS
Policy and Procedure

Title: **Retention of Non-Medical Records**

Policy No. 06.013

Page: 4 of 6

APPENDIX A
RETENTION OF NON-MEDICAL RECORDS SCHEDULE

Applicable to all Departments, Programs, Services, and Administrative areas
Within CancerCare Manitoba.

All Non-Medical Records shown here must be retained for its corresponding
minimum retention period and shall be retained by the party responsible for same.

NON-MEDICAL RECORD	RETENTION PERIOD	RESPONSIBILITY OF	ADDITIONAL INFORMATION
Annual Reports	Permanent	Corporate Office	
By-Laws (HSC, Medical Staff, etc.)	Permanent	Corporate Office	
Minutes & Corporate Filing of all Corporations: - Board of Directors - Executive Team - Medical Staff - All other committees	Permanent Permanent Permanent 7 years	Corporate Office Corporate Office Medical Admin Departments assigned	Includes Executive Team, other Board committee, Medical Staff sub-committees, etc.
Policies/Procedures: - Corporate Policies - Dept/Program/Service - Specific policies	Permanent Permanent	Corporate Office Director/Head of relevant Dept/Program/Service	
General Correspondence – Substantive Matters (in any form, including electronic form)	3 years	All	Minimum – may exceed 3 years if appropriate. Correspondence concerning transient and non-substantive matters can be discarded when it is no longer of use for reference.
Occurrence Reports	3 years	All	
Audited Annual Financial Statements	Permanent	Finance	This includes External Auditor and Federal returns
Bank Statements, pass books, reconciliations & cancelled cheques	7 years (current fiscal year plus six previously closed fiscal years)	Finance	
Billings	7 years (current fiscal year plus six previously closed fiscal years)	Finance	Complete with back-up
Budgets	7 years (current fiscal year plus six previously closed fiscal years)	Finance	
Cash Receipts	7 years (current fiscal year plus six previously closed fiscal years)	Finance	
Debenture Certificates	7 years	Finance	After maturity or redemption
Debenture Coupons	7 years	Finance	After payment
Equipment Ledger	Permanent	Finance	
Funding Approvals (8 Manitoba Health)	Permanent	Finance	All funding approval correspondence is to be sent (or copied) to the Finance Department
General Ledgers	Permanent	Finance	
Insurance Policies - Liability (including wrap up) - Other (including	30 years (after policy expires) 6 years (after policy expires)	Finance Finance	

CANCERCARE MANITOBA GOVERNING DOCUMENTS
Policy and Procedure

Title: **Retention of Non-Medical Records**

Policy No. 06.013

Page: 5 of 6

property, boiler and machinery, travel accident, course of construction)			
Inventory Sheets	7 years (current fiscal year plus six previously closed fiscal years)	Finance	Year-end counts
Invoices: - Construction - Other capital - Operating	Permanent 7 years (current fiscal year plus six previously closed fiscal years) 7 years (current fiscal year plus six previously closed fiscal years)	Finance Finance Finance	From date of invoice
Journal and Subsidiary Ledgers: - Accounts Payable - Accounts Receivable - Cash Receipts - Miscellaneous and other - All other	7 years (current fiscal year plus six previously closed fiscal years)	Finance	
Capital Construction Records	Permanent	Capital Planning & Construction	Includes: - Survey and title search - Contracts (incl. Change orders) - Functional Program - Equipment Listing - Funding agency approvals - Testing reports & certificates - As built drawings
Contracts: - Supplies - Service - Maintenance	7 years (after the later of completion performance, expiry or termination)	Department/Program/Service/site doing the contracting	
Deposit Books/Slips	7 years (current fiscal year plus six previously closed fiscal years)	Finance	
Inspection Reports: - Initial Inspection - Record - Fire (sprinkler/alarm) - Elevator	Permanent Minimum 2 years or current and preceding record	Facilities Manager	
Payroll Records - Garnishments - Time Cards/sheets - T4's - T4A's - Work schedules	7 years (after expiry) 7 years (current fiscal year plus six previously closed fiscal years) 7 years (current fiscal year plus six previously closed fiscal years) 7 years (current fiscal year plus six previously closed fiscal years) 7 years (current fiscal year plus six previously closed fiscal years)	Payroll Human Resources/Payroll Finance/Human Resources Finance/Human Resources Originating Department/ Program/Service/site	Includes hours and dates scheduled to work and actually worked.
Personnel Records: - Employee	10 years*	Human Resources	*After termination or ending of

CANCERCARE MANITOBA GOVERNING DOCUMENTS
Policy and Procedure

Title: Retention of Non-Medical Records

Policy No. 06.013

Page: 6 of 6

<ul style="list-style-type: none"> - Physician Files - Recruitment/competition files - Grievance files Investigation Files: <ul style="list-style-type: none"> - Respectful Workplace - Disciplinary Matters - Violations of Work Rules - Theft <p>(this list is not exhaustive)</p>	<p>Permanent 1 year*</p> <p>Permanent</p> <p>4 years</p>	<p>Medical Admin. Human Resources</p> <p>Human Resources</p> <p>Human Resources</p>	<p>employment relationship</p> <p>Contents can be destroyed in 4 years, however, the grievance and settlement documents (awards/memorandums) shall be kept permanently in electronic format</p>
<p>Employee Files – Occupational Health</p> <ul style="list-style-type: none"> - Health & Safety Committee minutes - First Aid - Illness/Injury - Hearing, conversation/ noise control - Machines, Tools & Robots Locking Out- Safety Precautions - WHMIS Data Sheets - Chemical & biological substances - Asbestos 	<p>30 years</p> <p>10 years</p> <p>5 years</p> <p>10 years</p> <p>30 years</p> <p>30 years</p> <p>30 years</p>	<p>Occupational Safety & Health</p> <p>Occupational Safety & Health</p> <p>Occupational S&H</p> <p>Occupational S&H</p> <p>Occupational S&H</p> <p>Occupational S&H</p> <p>Occupational S&H</p>	<p>Retention of records as required by the Workplace Safety and Health Regulation:</p> <p>Part 2, 2.10: Retention of Records: An employer must ensure that a record required to be made or retained under this regulation is not destroyed or disposed of</p> <p>(a) for the period prescribed in this regulation for the specific class of records; or</p> <p>(b) if there is no prescribed period, for five years after the record is made or comes into the possession of the employer.</p>