

Information Handling When Decommissioning Systems

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General

The purpose of this document¹ is to assist units when decommissioning UBC systems, platforms and applications holding information, data and records² while ensuring the university's records retention and disposition obligations are being met. Use this document in consultation with the Records Management Office.

NOTE: If the system holds sensitive/confidential information and the party responsible for performing the migration is external to UBC, a <u>Security and Confidentiality Agreement (SACA)</u> must be signed. Additionally, the method of migration must align with <u>ISS U3, Transmission and Sharing of UBC</u> <u>Electronic Information</u>.

Scope and Authority

This document applies to all departments and administrative units at UBC as defined in Board of Governors Policy GA4 and to all persons who create, receive or maintain Records in the course of their duties on behalf of the University. Please see the Board of Governors <u>Policy GA4</u>, Records Management and <u>UBC Records Retention Schedules</u> for more information.

Any systems, applications, data or records that are, or reasonably anticipated to be, subject of a legal hold including access to information via FIPPA requests must not be altered, migrated or disposed of until all relevant holds have been lifted.

¹ This document is based on a similar document produced by the Government of Alberta, Enterprise Information Management.

² Information, data and records can be used interchangeably in this document.

Procedures

This document provides an overview of potential migration scenarios and describes the steps involved in each. The following sample is not exhaustive.

Migration of all data and all information

Using the template, staff responsible for migration must inventory data that will be migrated, including but not limited to:

- Type of data and information
- Date range
- Records retention and disposition schedule information

Once the inventory has been verified as accurate, the business and data owner must confirm that the migration has been completed successfully and sign off.

When the data has been migrated to the new system, retention schedules must be applied to the old data (schedule number: <u>IM4670-10: Information Management - Information Systems Operations – Back-ups</u>.) Use this schedule for a **complete migration only**.

NOTE: If data described in the original inventory has a final disposition of **FR** (Full Retention by University Archives) the source data **would not be** destroyed under the retention schedule for backup data (IM4670-10), instead the data would be analyzed and transferred to the University Archives for permanent retention.

Partial Migration of Data and Information

The guidance below for partial migration **applies only** if all data, records and information remaining in the system or application has met its retention period. If a system or application contains data not being migrated and which has not yet met its retention date, the data must remain secure and accessible for the duration of the retention period.

Staff conducting the migration must inventory the data and information to include, at a minimum:

- Type of data and information
- Function it supports
- Date range
- Records retention and disposition schedule information

Once the inventory has been verified, the business and data owner must attest that the migration has been completed successfully.

Where only a portion of the information is being migrated to the new system, an analysis of the remainder of the records must be completed, including:

- Who was the business/data owner?
- What was the system's function?
- What was the last date the system or application was used?

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• What data and information are contained in the system or application?

Using this information, the Records Management Office will provide an appropriate retention schedule for disposition of the information not included in the migration.

No Migration of Data and Information

There may be cases where a system of application becomes obsolete (e.g., too expensive to maintain, incompatible with newer system, no longer supported by vendor, etc.). In such cases, the information within the system may not be migrated to a new system at all.

Staff must inventory the data and information that will not be migrated, including:

- Type of information
- Function it supports
- Date range
- Records retention and disposition schedule information

Data and information in an obsolete system or application not migrated to the new system must be destroyed under the appropriate records retention and disposition schedule.

NOTE: Ensure that if the data and information described in the original inventory is described in the schedules as **FR** (Full Retention by University Archives) it is transferred to the university archives for permanent retention.

Inaccessible Data and Information

There may be cases where a system or application cannot be accessed. In this scenario an analysis of the data must be completed, including:

- Who was the business/data owner?
- What was the system's function?
- What was the last date the system or application was used?
- What data and information are contained in the system or application?
- Records retention and disposition schedule information

It is sometimes possible to recover data using forensic tools. The business owner should consider the value of the records against the risk and cost of recovery using such tools. In such cases, a one-time schedule will be created by the RMO for Unsalvageable Damaged Records

User Acceptance Testing (UAT), Development Environments and Back-up Data

When decommissioning a system that involves full or partial migration be sure to also manage the associated UAT and development environments. Data and information created in development or testing environments must be disposed of under <u>IM4670-42</u>: <u>Information Management - Information</u> <u>Systems Operations - UAT/TST Environments</u>. Back up information should be destroyed using <u>IM467-10</u>: <u>Information Management - Systems Operations - Back-ups</u>.

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References

- Records Retention Schedules: <u>Retention Schedules</u>
- Information Security Standard U1: <u>Security Classification of UBC Electronic Information</u>
- Information Security Standard U3: <u>ISS U3, Transmission and Sharing of UBC Electronic</u> <u>Information</u>
- Information Security Standard U8: Information Security Standard #8
- Data Destruction Confirmation Form
- <u>Security and Confidentiality Agreement (SACA)</u>



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Template with Sample Data



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RECORDS MIGRATION & DISPOSITION FORM

Instruction: This form is to used in conjunction with *Information Handling When Decommissioning Systems*. Retain a copy of this form for your records.

Confirmation: This form serves as confirmation that the data being destroyed is not part of a current or outstanding claim, litigation, investigation, FIPPA request, legal hold or audit. This Migration and Disposition Form documents compliance with UBC Records Retention Schedules and privacy regulations.

System Name	Туре	Function data supports	Migration Type	Total Date Range	Data Owner	Retention Schedule	Disposition	Date of Disposition
System A	Contact Info	Survey	None	2010-2023	Records Management	Transitory Records	Content of System A meets the threshold to be destroyed according to transitory records schedule	20230501
System B	Shift Schedules	Payroll	Partial	2010-2026-	UBC Security	FM3000: Financial Management - Accounting - University Records Management Office (ubc.ca) Retention: FY+6Y, D	2 years migrated to new system the remainder retained securely via Movelt for remainder of retention. RMO will manage remainder of retention	Remainder data transferred to RMO 20220925

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System D ions systemPresident's Office communica- tions systemUniversity GovernancePartial2010-2023 PartialPresident's Office OfficeUG8200-30 Correspondence UG8200: University Governance - Strategic Governance - President and Vice Chancellor - University Records Management Office	System C	migrated so when the project	vestigation Ir	Migration took place 20220216 Destruction of back up data
System D President's Office communica- tions system University Governance Partial 2010-2023 President's Office UG8200-30 Correspondence U068200: University Governance - Strategic Governance U068200: University Governance - Strategic Governance U068200: University Governance - Strategic Governance - - President's U068200: University Governance - Strategic Governance - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -				took place 20220516
(ubc.ca) Retention: CY+5Y, FR	System D	University Archives will retain an output of all the old data	ffice G ommunica-	Migration to new system took place on 20230505 Transfer of data to UA took place on 20230505

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Template

UBC	
RF	

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System name	Туре	Function data supports	Migration type	Total date range	Data owner	Retention schedule	Disposition	Date of disposition