

ADMINISTRATIVE PROCEDURES	
Administrative Procedure Section <b>FOI/RECORDS MANAGEMENT</b>	Policy Number <b>305</b>
Administrative Procedure Number <b>AP-FOI-305</b>	Page <b>1 of 16</b>

## ADMINISTRATIVE PROCEDURE TITLE

Records and Information Management

### 1.0 ADMINISTRATIVE PROCEDURE

#### 1.1 IDENTIFYING INFORMATION REQUIRING CAPTURE

Records identified will be essential to ongoing legal requirements and effective functioning of the Board and will fall into the following three categories. It will include, but is not limited to:

- (a) **Legal** – Board minutes, insurance, contracts, deeds, amendments, student records, correspondence, electronic records, any record produced by means of computer hardware and software, etc.
- (b) **Historical** – books, published reports, forms, photographs, graphic works, maps, plans, electronic records, sound recordings/video tapes, etc.
- (c) **Administrative** – financial and audit documents, tax documents, Human Resource documents, duplicate documents, electronic records, temporary working papers, etc.

#### 1.2 RECORDS CENTRES

- (a) School principals and managers/supervisors at the Catholic Education Centre will be responsible for the effective management of records created and/or used in the school or department.
- (b) Records will be labeled and organized for efficient retrieval and destruction.

- (c) A centralized Records Centre located at the Catholic Education Centre will maintain records which are not frequently needed but must be retained for a number of years according to the Board's Records Retention Schedule.

### 1.3 RETENTION SCHEDULE

- (a) The Records Retention Schedule located in the Board's Records Management Manual is the official schedule for the PVNC Catholic District School Board. It will outline retention of the Board's records according to their administrative, fiscal, legal, and research/archival value. It will include records that must be retained according to legislation and/or Board procedures and a notation of the archival/historic importance of each record series (at the secondary level), where appropriate.
- (b) All recorded information will be identified in a retention schedule and will not be destroyed or removed from the control or custody of the Board except as authorized in the schedule.
- (c) Additional records will be stored at the discretion of the principal or department manager/supervisor.
- (d) The schedule will exclude all reference, resource, and library material such as books, articles, and external publications which are not official records of the Board.
- (e) The user will be responsible for purging, storing, and transferring inactive records according to the procedure as laid out in the Records Management Manual.
- (f) Shredding/recycling paper records will be done through the Board's Contracted Shredding Service.
- (g) The following process will be followed in maintaining the Board's retention schedule:
  - (i) establish a regular schedule for disposal of records, normally once a year;
  - (ii) review the retention schedule on a regular basis and update as required;
  - (iii) train staff in records retention procedures.

#### 1.4 RETENTION PROCESS

- (a) For access and privacy purposes, there will be only one complete official retention copy of each record.
  - Back-up copies will be prepared only when there is sufficient need for authenticity of the original record, when they are considered vital records and to provide ease of access.
- (b) Electronic material will be backed up in accordance with the schedule developed by Computer Services.
- (c) At the time of storage, a label indicating the disposal date will be affixed to the record before it is stored to facilitate destruction per the retention schedule.
- (d) Confidential/Personal Information Records
  - Confidential records and those containing personal information will be treated as such when storing, maintaining, transferring, or destroying them. They will be destroyed in such a manner that they cannot be read, interpreted, or reconstructed according to the terms of the Municipal Freedom of Information and Protection of Privacy Act.
- (e) Imaging
  - Records with a remaining retention of 10 years or greater will be imaged if funds are available, e.g. OSRs, employee files, permanent financial records, Board/committee agendas and minutes.

#### 1.5 STORAGE

- (a) The development of a records storage plan will include the short and long-term housing of inactive physical records and digital information.
- (b) The Records Control Centre will maintain records that are not frequently needed but must be retained for a number of years.
- (c) Records will be labeled and organized for efficient retrieval and destruction.

- (d) The Records Control Centre will be the depository for all Board reports, Board agendas, Board minutes, etc.
- (e) Transfer of records from departments, schools will be done by completing a "Records Transfer List" form and with the approval of the Manager of Communications and Freedom of Information/Protection of Privacy.
- (f) Special consideration will be given to archival information and records on the history of the PVNC Catholic District School Board.
- (g) Archival records will be handled with care, and appropriate protective measures will be taken to reduce wear and tear on records.

## 1.6 DISPOSAL

- (a) In general, the school/department that created or authorized creation of a record will be responsible for its retention and disposal, including records stored on a computer.
- (b) Records will be reviewed regularly for disposal including electronic and other viable media records, and in accordance with the Board's Retention Schedule. This includes all relative back-up tapes and hard drives.
- (c) Duplicate records and temporary working papers such as rough notes or informal drafts will be destroyed at the time the official records are destroyed as they should not outlive the documents that resulted from them.
- (d) Records which include confidential/personal information or are of a sensitive nature will be destroyed by shredding or by a means to render the information illegible.
- (e) To avoid overloading the storage capacity on a server, the Computer Services department will eliminate records after advising the users and allowing a reasonable time for them to destroy the record or make other arrangements for storage.
- (f) Most electronic/voice mail and telephone transitory messages will be considered short-term records and will be disposed of as soon as their purpose has been served. However, if the content of the message or any attachments are considered business records, they fall under the Records Retention Schedule.

- (g) The following will be the process for destroying Board/school records:
- (i) Staff will refer to the approved retention schedule for time lines;
  - (ii) A record of the destruction will be made and a copy sent to the Manager of Communications and Freedom of Information/Protection of Privacy; (A letter listing the records destroyed is a suitable record of destruction.)
  - (iii) Destruction records will be retained permanently;
  - (iv) The retention schedule will be amended and approved to dispose of a record not listed.
  - (v) In the event of a school closure/consolidation, the principal will work with the Manager of Communications and Freedom of Information/Protection of Privacy to complete residual record-keeping requirements for student, administrative, and archival records.
  - (vi) If there is a potential lawsuit, investigation or pending audit, related documents will not be destroyed.

#### 1.7 RECORDS CONFIDENTIALITY

- (a) Practices will be in place to protect confidential, sensitive, and personal records and information from unauthorized collection, use, disclosure, or destruction in accordance with the provisions of the Education Act, the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), confidentiality requirements of the Ontario Student Record Guideline, the School Board/authority privacy policy, and other relevant statutes and regulations of the Province of Ontario and the Government of Canada.
- (b) Shredding locked bins will be provided for the disposal of personal and confidential information.
- (c) Confidential records and those containing personal information will be treated as such when storing, maintaining, transferring, or destroying them. They will be destroyed in such a manner that they cannot be read, interpreted, or reconstructed according to the terms of the Municipal Freedom of Information and Protection of Privacy Act.

#### 1.8 RECORDS SECURITY

- (a) All records will be managed to meet rules of evidence and legal discovery.

- (b) Contractual arrangements will include provisions for the protection and appropriate use of Records and Information Management to mitigate risks.
- (c) Records and Information Management will be managed to support business continuity and recovery in the event of disaster.

## 1.9 ACCESSIBILITY

- (a) Access to records internally and outside of the Board will be given priority, while balancing the requirements of business confidentiality, data privacy, and public access.
- (b) Information to support evidence of Communications FOI/POP, actions, and decisions will be routinely recorded and stored.
- (c) Information will be accessible to staff who require it in the performance of their duties and are authorized to access it.
- (d) Information will be shared across the organization and with social agencies in accordance with operational needs and statutory provisions.
- (e) Plans and practices to actively make records available to the public will be in place, and records will be available to the public by request, subject to the statutory requirements.
- (f) The procedure for managing official requests is as follows:
  - (i) Every written application made under the Municipal Freedom of Information/Protection of Privacy Act for access to information will be forwarded to the Manager of Communications and FOI/POP for registration. A copy of the request will be forwarded to the Director of Education for input.
  - (ii) The decision for granting access, or refusing the request, will be made by the Director of Education in consultation with the Manager of Communications and FOI/POP, guided by the relevant clauses of the Act.
  - (iii) All responses to an application, whether granted or denied, will be directed to the Manager of Communications and FOI/POP for review and final documentation, and then forwarded to the individual making the request within 30 days after receipt of application.

- (iv) In the event that a response to an application for access cannot be completed within the 30 day limit, the Manager of Communications and FOI/POP will be notified and will give the individual making the request written notice of the extension, setting out:
- the length of the extension, and
  - the reasons for the delay, and
  - the person's right of appeal to the Freedom of Information and Privacy Commissioner to review the extension.
- (v) In the event that the cost involved in processing a response to a request is estimated to be equal to or in excess of twenty-five dollars, the Manager of Communications and FOI/POP will be notified and no further action should be taken until otherwise advised by the Manager. The Manager of Communications and FOI/POP will give the individual making the request written notice of the estimated costs with a request for the individual's authorization to complete processing the access request.

#### 1.10 ELECTRONIC RECORDS

- (a) Electronic records will be governed by the statutes that apply to the access, retention, and destruction of all public records. They will include, but are not limited to:
- computer-generated records and computer database files;
  - records transferred (by scanning, fax, data input, etc) from paper or other "hard copy" files into a computer or document management system;
  - records on disk (hard disks, optical disks, etc);
  - records on magnetic tape;
  - audiotapes and videotapes;
  - e-mail and voicemail messages;
  - computerized calendar and time management systems;
  - facsimile documents received on a computer and stored electronically;
  - intranet and internet transmissions.
- (b) Microfilming or other forms of electronic imaging will be done for organized series of records which will not require extensive reorganization prior to filming, where there is an urgent need for reductions in storage space, where many users may need copies of the records, and where records are too fragile to be used on a regular basis. It will not be done where the original records are poorly organized or are illegible.

- (c) To ensure that the information in electronic format is accessible, work sites/schools will record the following on the outside of the disk, tape, or container:
  - (i) description of the data;
  - (ii) name of the system on which the medium is to be used;
  - (iii) name and version number of the application software;
  - (iv) capacity and density of the media;
  - (v) recording date(s);
  - (vi) security precautions and access restrictions;
  - (vii) type of copy (storage, working, back-up, etc);
  - (viii) any special attributes;
  - (ix) any other pertinent information regarding the data stored.
- (d) The need to maintain electronic records will also be taken into consideration when upgrading software or hardware throughout the system. Electronic files, particularly those designated as permanent records, will be migrated onto the new technology and stored in a secure and stable area.
- (e) Electronic material will be backed up in accordance with the schedule developed by Computer Services.
- (f) In general, the school/department that created or authorized creation of a record will be responsible for its retention and disposal, including records stored on a computer.
- (g) To avoid overloading the storage capacity on a server, the Computer Services department will eliminate records after advising the users and allowing a reasonable time for them to destroy the record or make other arrangements for storage.
- (h) Most electronic/voice mail and telephone transitory messages are considered short term records and will be disposed of as soon as their purpose has been served. However, if the content of the message or any attachments are considered business records, they will fall under the Retention Schedule.

#### 1.11 ARCHIVES

- (a) The Records Management procedure has been designed to specifically address the establishment of a records management system and, in addition, special consideration will also be given to those records identified in the schedule as having archival value. Although no longer required for daily administrative purposes, these



records contain information which is of value for both long-term use and for historical reference.

- (b) Archival records will have administrative, fiscal, legal, evidential, and/or informational values that deem them to merit permanent retention.
- (c) The archival program will effectively store records which are to be kept permanently once the original operational need for the record has ceased to ensure that valuable documents are not destroyed.
- (d) Care will be taken in handling and boxing archival records. Adequate descriptions must be made to permit ready access, and appropriate protective measures must be taken to reduce the wear and tear on records that do not have to be consulted often.
- (e) Because of the special attention archival records require, they will be maintained by trained staff.
- (f) Archival retention schedules will be approved by the Manager of Communications and Freedom of Information/Protection of Privacy. The following list provides general information on the types of records which should be maintained as archival for historical reference:
  - minutes of official meetings;
  - Board reports;
  - newspaper clippings/scrapbooks/photographs;
  - architectural plans/engineering drawings;
  - audio visual materials;
  - in-house publications/brochures/promotional material; and
  - legal documents.
- (g) The Manager of Communications and Freedom of Information/Protection of Privacy will be contacted regarding appropriate legal agreements to donate historical documents and artifacts to an approved archives, local museum, or historical society.

## 1.12 VITAL RECORDS

- (a) A Vital Records Plan will be developed to identify and protect those records that are vital to getting the system up and running immediately after a disaster, e.g. water damage, fire. It will include a pre-arranged set of scenarios for dealing with system records and back-up copies of vital records.

- (b) Once identified and duplicated, the record copies will be kept in a separate and safe location as determined by the department/school administrator.
- (c) The location of all back-up material will be reported to and maintained by the Manager of Communications and Freedom of Information/Protection of Privacy.

### 1.13 ROLES - ACCOUNTABILITY AND STEWARDSHIP

This procedure will apply to all records and information within the custody or under the control of the PVNC Catholic District School Board, including those records and information relating to the operation and administration of the school or School Board and those records and information relating to employees and students individually.

**The Board:**

The PVNC Catholic District School Board supports the management of records and information, including electronic and paper records, in a disciplined, coordinated and strategic manner and, as such, will designate the Director of Education as the official Head of the institution as defined in Section 3 (2) of the Municipal Freedom of Information and Protection of Privacy Act, 1989. The Board further delegates responsibility for the general administration of the Act and operational decisions to the Manager of Communications and Freedom of Information/Protection Privacy in consultation with the Director of Education.

**Director of Education:**

- In compliance with the Act, the Director of Education will delegate the administration of the Act to the Manager of Communications and FOI/POP.
- The Manager of Communications and FOI/POP will furnish periodic reports to the Chairperson of the Board. Reports will include (but are not limited to) any requests made under the Act for either access to public or personal information or requests for corrections to personal information and the responses given.

**Manager of Communications and FOI/POP:**

- Ensure the ongoing availability, integrity, preservation, and security of all recorded information created, commissioned, or acquired by the Board;
- Ensure the security and effectiveness of the record management process and storage facilities;
- Ensure the preservation of all recorded information of permanent value;
- Identify roles and responsibilities for the efficient management of recorded information and provide training to employees;
- Ensure there is a schedule in place for disposal of records;
- Ensure education is provided to all employees on their roles under the Act.

**Records and Information Management Coordinator:**

The Records and Information Management Coordinator is responsible for maintaining and further developing the records and information management systems of the PVNC Catholic District School Board. The Records and Information Management Coordinator will:

- Maintain the central corporate records system (both paper and electronic records);
- Classify and code records;
- Audit and monitor document profiles in the records management databases, compare records to database profiles and make changes where required;
- Create physical files;
- Index documents where required, ensure that records and files are complete and secure;
- Provide general assistance to staff requiring access to corporate records and in using the records management databases.

- Search records and researches other information resources in response to requests from all staff and contractors and prepare the results for review;
- Conduct database searches and retrieves records from the central files and other sources using a variety of search techniques;
- Assist in the maintenance of the central corporate files;
- Assist with transfers of records to storage;
- Arrange for confidential destruction of records according to the Board's records retention schedule;
- Oversee off-site and schools' records retrieval service.

**Employees:**

- All Board employees will be responsible for the records and information they create and maintain to support the business operations of the school or Board.
- Employees will be aware of the Policy and its requirements and will ensure ongoing compliance with it.

**Departments and Schools:**

Each Department Manager/Supervisor or Principal within the Board will support the RIM program by ensuring that the Policy and Administrative Procedures are applied, and will also:

- Create, receive, and manage school and Board records and information to provide details about and evidence of the activities of the School Board;
- Manage all records and information regardless of format (paper, electronic, audio, videotapes, etc.) according to the Board's RIM Policy and all applicable federal and Ontario laws and School Board/authority by-laws and procedures;
- Manage electronic records and information, including e-mail records, in the school and Board's content/records management application when feasible;
- Print and file records and information in the departmental records area if there is no electronic content/records management system in place;
- Maintain records and information according to the Board's classification scheme in collaboration with the Records and Information Management Coordinator;
- Ensure that appropriate access and security rules are in place to protect both paper and electronic records as required in collaboration with the Records and Information Management Coordinator;
- Apply the records and information retention schedules and securely dispose of records in accordance with those schedules in collaboration with the Records and Information Management Coordinator;
- Work with the Manager of Communications and Freedom of Information/Protection of Privacy to ensure that all third party organizations, contractors, or agents who receive or collect personal information on behalf of the Board are aware of and comply with this Policy.

**2.0 TERMS AND DEFINITIONS:****2.1 ADMINISTRATIVE RECORDS**

Administrative records include records regarding routine administrative and office service functions.

**2.2 BUILDING AND FACILITY MANAGEMENT**

Building and facility management includes records regarding the development, maintenance, construction, and operation of Board offices, properties, grounds, and building. It also includes vehicle and occupational health and safety matters.

### 2.3 COMMUNITY RELATIONS

Community relations include records regarding the Board's relations with the public as well as records relating to the production and distribution of information to the public, outside agencies, and schools.

### 2.4 EDUCATION

Education includes records regarding the planning and implementation of curriculum programs, program reviews, and curriculum guidelines; co-curricular information such as field trips and educational tours. It also includes records regarding programs centered on preparing the students for involvement in the community, such as career information, multicultural services, heritage language programs, co-operative education, and educational services to the general community such as continuing education, day care, safety awareness, parks and recreation programs.

### 2.5 FINANCE AND ACCOUNTING

Finance and accounting includes records regarding financial management, budgeting, accounting, purchasing, and all matters concerning the allocation and control of funds to departments and schools. It also includes records on payroll, investments, scholarships, and transportation costs.

### 2.6 HUMAN RESOURCES

Human resources include records regarding the Board's relationship with its employees. It also includes records regarding general staff programs as well as information on specific employees.

### 2.7 INFORMATION MANAGEMENT

Information management includes records regarding records and information management, computer and information systems, archives/library management, media services, mail and courier services, requests for information, printing and duplication services.

### 2.8 LEGAL

Legal includes records regarding legal matters as well as contracts and agreements, insurance and real estate matters. It also includes federal and provincial legislation affecting or of interest to the Board.

## 2.9 POLICY AND DIRECTION

Policy and direction includes records regarding the establishment of policy, regulations, and administrative procedures as well as the activities of the Board of Trustees. It also includes Ministry guidelines, intergovernmental relations, strategic/accommodations planning, school boundaries, and research.

## 2.10 RESEARCH/PLANNING

Research/planning includes records regarding strategic/program planning and research, as well as enrolments and Ministry reports.

## 2.11 STUDENT RECORDS

Student records include records regarding the delivery of services to individual students as well as records required under the Ontario Student Record (OSR) Guideline.

### **Records Retention Schedule** as follows:

- (i) **Classification Code** - the assigned primary and secondary code for the record type.
- (ii) **Record Series/Scope Notes** - this column indicates and describes the types of identical or related records that are normally used and filed as a unit.
- (iii) **Department Responsible** - this column indicates the department responsible for keeping the "official" copy of the record. "Originating" department is where the record comes from or is brought into existence, i.e. created or received.
- (iv) **Active Retention** - this column indicates the total length of time the record is kept "active". It can be based on fiscal, school, or calendar years (e.g. for financial records retained after September 1998, it will be based on the school year). This column also indicates the maximum total retention period for these records in departments other than the responsible department (i.e. copies).
- (v) **Inactive Retention** - this column indicates the total length of time the record is to be kept in storage or at the Records Centre.
- (vi) **Total Retention** - this column indicates the total length of time the record is to be kept (i.e. sum of Active and Inactive).
- (vii) **Retention Codes** - these retention codes are listed at the bottom of each page as follows:
  - C - "Current Year": All retention periods indicated begin after the current year, i.e. the storage time in the active office area.

- S - “Superseded”: A file with this retention period is transferred or destroyed when it has been replaced with a new/revised version of the current record.
- P - “Permanent”: A file with this retention period is never destroyed - could be stored in the Records Centre.

### **Legislation, Policies Standards and Practices**

The context for information management for school boards/authorities is provided by legislation, Ministry Policy Program Memoranda, and school board/authority policies and procedures. School boards/authorities should be aware of the following statutes which provide guidance for the collection, use and maintenance of recorded information.

## **3.0 REFERENCES RELATED DOCUMENTS**

### Education Act of Ontario

The *Education Act* is the administrative statute under which all Ontario school boards/authorities must operate. The Act sets out provisions for the creation and maintenance of the pupil record (s. 265 (1) and s.266) and for the establishment of a records management program (s.171(38)).

### Ontario Evidence Act

Sets out how RIM may be used as evidence in legal proceedings in a court of Ontario.

### Canada Evidence Act

Sets out how RIM may be used as evidence in legal proceedings in a court in a matter under federal jurisdiction.

### Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)

MFIPPA addresses issues of disclosure of records under the care and custody of school boards/authorities, as well as the collection, use, and disclosure of records containing personal information. MFIPPA also regulates the collection, use, disclosure, and accuracy of personal information stored in records and creates a process for obtaining access to recorded information.

Personal Health Information Protection Act (PHIPA)

PHIPA addresses the collection, use, disclosure, retention, and destruction of personal health information.

Other Statutory Provisions

The Table of Laws and Citations with Retention Requirements for School Boards included as part of the Guideline on the Model Classification Scheme and Retention Schedule provides a listing of other statutory provisions contained in the laws of Canada and Ontario that may affect the creation and retention of school Board RIM program.

Ministry Policy/Program Memoranda (PPMs)

Ministry of Education PPMs may include requirements for the collection, creation, use retention and destruction of RIM.

**4.0 RELATED ADMINISTRATIVE PROCEDURES**

AP-FOI-307, Ontario Student Record  
AP-FOI-308, Municipal Freedom of Information/Protection of Privacy  
AP-FOI-311, Records and Information Management Prevention, Emergency, Disaster, and Recovery

**5.0 RELATED FORMS****6.0 ADMINISTRATIVE PROCEDURE REVIEW DATE**

October 2015

**7.0 APPROVED BY BOARD**

October 26, 2010

**8.0 EFFECTIVE DATE**

October 26, 2010

**9.0 REVIEW BY**

Communication Services

**10.0 LAST REVISION DATE**