Administrative Procedure 1050



ONTARIO STUDENT RECORD (OSR) OFFICE INDEX CARD (OIC)

Responsibility:

Freedom of Information, Privacy and Records Information Management

Officer

Legal References: Education Act

Change of Name Act, R.S.O. 1990, c. C.7 Human Rights Code, R.S.O. 1990, c. H.19

Municipal Freedom of Information and Protection of Privacy Act

Personal Health Information Protection Act Youth Criminal Justice Act (S.C. 2002, c.1)

Related References: Ontario Ministry of Education OSR Guidelines 2000

Ontario Student Transcript Manual, 2013

Growing Success Assessment, Evaluation and Reporting in Ontario

Schools, 2010

Board Policy 1015 - Records Information Management

Board Policy 1014 - Privacy Protection and Access to Information
Administrative Procedure 1100 - Protection of Privacy and Access to

Information

<u>Administrative Procedure 1110 - Records Information Management</u>
<u>Administrative Procedure 1235 - Supporting Gender Identity and Gender</u>

Expression Accommodation of Students

IS-00-E Request for an OSR From a School in Ontario

IS-00-G Request for a True Copy of School Records from a School

Outside of Ontario

SES-06-ROI Release of Information
IS-10-02 Delegation of Signing Authority

IS-25-CSR Gender Identity and Gender Expression Accommodation for

Students

Appendix A - OSR Records Retention Appendix B - OSR Sign Out Sheet

Revisions: August 2020, June 2025

1. Preamble

This procedure follows the *Ontario Ministry of Education OSR Guidelines* 2000. Best practices around managing the OSR can be found in the Board's <u>Single Source Resource</u>.

2. Establishment of the OSR

As required by the *OSR Guidelines 2000*, an Ontario Student Record (OSR) will be established for each student who enrols for the first time in a publicly funded school operated by a school board in the province of Ontario. At the time of enrolment, the adult student (a person who is eighteen years of age or older) or the parent(s) or guardian(s) of a student who is not an adult must be informed of the purpose, content and accessibility of the OSR. The OSR is an on-going record and will be transferred as required, under specific conditions.

Documents contained in the OSR are considered personal information and subject to the *Municipal Freedom of Information and Protection of Privacy Act* and, at times, the *Personal Health Information Protection Act*.

3. Responsibility for and Access to the OSR

- 3.1 The Principal is responsible for the OSR, under the direction of the appropriate supervisory officer. Section 266 (2) of the Education Act, and the OSR Guidelines 2000, indicate that access to the OSR should be limited to supervisory officers, principals, teachers and designated early childhood educators for the improvement of instruction and other education of the student.
- 3.2 The following people also have the right to examine the contents of the OSR:
 - the student.
 - o the student's parent(s) or guardian(s) if the student is under 18 years of age.
 - Family and Children's Services caseworker, for students who are under 18 years
 of age and for whom Family & Children's Services has a supervision order.
- 3.3 All students, and the parent(s)/guardian(s) of students who are under 18 years of age, have the right to receive a copy of OSR contents. When an adult student, parent, or guardian requests copies of student records, they must show photo identification before receiving the documents (i.e. passport, driver's license). The photo identification is not to be photocopied.
 - Note, however, that where a pupil is 18 years of age or older, the parents have no such right of examination without consent of the adult student. This consent must be on file in the student's OSR using the appropriate form: Release of Information to Parents/Guardians, Adult Student Consent. Similar conditions apply to those students who have formally emancipated themselves from parent/guardian custody or control.
- 3.4 When the OSR is being viewed by non-school board personnel such as the student, parent/guardian or other authorized person, the school must ensure that the OSR is viewed in the presence of the principal, or school personnel designated by the principal. This is to ensure that records are not removed from the OSR and to provide assistance or explanation to the reviewer, if necessary.
- 3.5 The provincial Children's Law Reform Act and the federal Divorce Act both indicate that a non-custodial parent who has access to a child has the right to make inquiries and to be given information concerning the child's health, education and welfare.
- 3.6 Clerical functions for the maintenance of the OSR may also be granted to limited designated staff (i.e. the school secretary) by the principal. Form IS-10-02 (Delegation of Signing Authority) must be completed and kept in the Enrolment Register Binder.
- 3.7 When someone other than the parent/guardian/adult student is requesting access or copies of documents in the OSR, and if signed consent permission has been obtained from the parent/guardian/adult student, then access and/or copies can be made and provided. Fees can be charged to outside individuals requesting copies of OSR documents.
- 3.8 Parent volunteers, employees who do not teach the student, child and youth workers, coop students and students at the school must not be assigned clerical functions or allowed to review the contents of the OSR.
- 3.9 There are designated Education Centre personnel who may have access to the OSR who have responsibility for performing clerical functions such as: the establishment, maintenance and retrieval of microfilmed or electronically digitized OSRs. Storage of the OSR from schools that have closed. Scanning of retired OSRs for long term storage and

the preparation of transcripts.

3.10 Questions regarding access to the OSR should be directed to the principal, the appropriate supervisory officer or the Freedom of Information, Privacy and Records Information Management Officer.

4. Creating the OSR

- 4.1 An OSR consists of the OSR folder, the Documentation folder and, for elementary students, the Student Record of Accumulated Instruction in French as a Second Language in Elementary School ("French Card"). The French Card is electronic and housed in the Student Information System (SIS).
- 4.2 When creating an OSR for the first time, proof of age (e.g. birth certificate, registration of birth, baptismal certificate, passport, certificate of citizenship, permanent resident or other government identification) needs to be shown. The appropriate checkbox in Section A of the OSR folder needs to be checked and the OSR initialed and dated by the individual who viewed the proof of birth documentation.

Do not make copies of proof of birth and place them in the OSR. The following form must be completed and filed in the OSR for audit purposes Student Registration and Attestation Form - Confidential FS-22-H.

4.3 Student immunization information and Ontario Health Card number are <u>not</u> to be recorded on the OSR folder nor kept in the Documentation folder.

5. Re-Creation of Lost/Destroyed OSR

If an OSR folder is lost or inadvertently destroyed, a new OSR folder will be created. A notation will be made in the margin on the front of the new OSR folder that gives the date on which the new folder was created and the reason for the re-creation. The school is required to re-obtain or re-create as much of the contents of the OSR as possible, including but not limited to report cards, Record of Instruction in French, Documentation Folder and contents, and Individual Education Plans.

The Freedom of Information, Privacy and Records Information Management Officer (ext. 4409) must be notified any time an OSR needs to be re-created.

6. Maintaining the OSR

- 6.1 On an annual basis, or when a student leaves the school, ensure that Part B on the outside of the OSR folder is completed. This section indicates the school board, school, grade, teacher's name and start and end dates for when the student was enrolled in the school for that year.
- 6.2 The placing of dated photographs in the OSR is optional.
- 6.3 The OSR should be reviewed on a regular basis, at minimum once per school year. If certain information or material in an OSR folder is determined to be no longer **conducive to the improvement of the instruction** of the student, the staff member conducting the review should seek the principal's advice/approval concerning the removal of the item(s)
- 6.4 The removal of information included in the OSR should be reviewed by the principal on a case by case:
 - Is the information accurate?
 - Is the information current?
 - Will the information assist in the improvement of instruction?
 - Did the parent/guardian/adult student request the inclusion of the information?

If so, their consent must be obtained before the information is removed.

- 6.5 The OSR shall not be removed from the school.
- 6.6 The OSR must be tracked within the school by a sign-out process using Appendix B.
- 6.7 All materials kept in the OSR should be dated.
- 6.8 Any information removed from an OSR must be disposed of in a secure manner (i.e. shredded).
- 6.9 The responsibility for the OSR of a student who attends more than one school shall remain with the school that provides the majority of programming (the "home" school). The OSR folder should reflect the name of the home school of the student.
- 6.10 The OSR for students who have left the Board to be homeschooled 100% of the time shall remain at the school of last attendance.

7. Report Cards

- 7.1 A Progress Report and/or the Provincial Report Card will be created for all students who have been in a WRDSB school for 6 consecutive weeks during the reporting period. *The original signed copy will be provided to the student/parent and an exact copy of the* Progress Report and/or Provincial Report Card will be filed in the OSR:
 - at the time of his or her transfer to another school.
 - at the time of his or her retirement from school.
 - at the end of each of the reporting periods.
- 7.2 All progress reports and report cards for each school year, with the returned Page 3 Parent Response Form, must be stapled together with a single staple in reverse chronological order with the final term on top and filed in the student's OSR.
- 7.3 An exact copy of the Provincial Report Card or the Progress Report will be forwarded to the parent(s)/guardian(s) of a student who is not an adult or to the student if he/she is an adult.
- 7.4 As per AP1235 a student of any age can request a report card in their "preferred name" and gender. A report card in the student's "preferred name" and gender shall be sent home with the student. A copy of the "preferred name" report card will be attached to a copy of the legal name report card, and both will be filed in the OSR.
- 7.5 If the Parent Response Form is not returned, schools are advised to attach to the report card an indication that the response form was not returned. A stamp or a sticker is acceptable.
- 7.6 Students in fully self-contained special education classes receive a provincial report card with the following statement appearing in each Learning Skills comment box: "If your child's Individual Education Plan includes alternative expectations, please see the attached Alternative Report Card." Additionally, a mark of AL is entered, and the IEP checkbox checked. The alternative expectation comment is currently flooded into the report cards by the Board's I.T. department. The Alternative Report card is a standard report card created by the Board's Learning Services department. It is completed by the teacher and sent home attached to the Provincial Report Card.

8. Documentation File

8.1 A Documentation File is to be established and kept in the OSR folder. The following information should be stored in the Documentation folder- See Appendix A - OSR Records

Retention.

All Documentation File items are to be organized chronologically with the most recent records at the front of the file.

- 8.2 The following information should not be stored in the Documentation folder:
 - Any information pertaining to the Youth Criminal Justice Act (i.e. correctional institution documentation) should not be placed in the Documentation File but should be kept in a confidential school file.
 - Copies of proof of birth
 - Copies of immigration documents, unless the document is being used for proof of birth.
 - Copies of proof of marriage.
 - o Immunization record and health card numbers.
 - Proof of address.
 - Temporary Student Withdrawal Forms.
- 8.3 The principal should ensure that the Documentation File is reviewed regularly.

9. Ontario Student Transcript (OST)

- 9.1 Transcripts are issued for secondary school students in order to track their achievement and *Student Transcript (OST): Manual 2010* for a detailed explanation of the OST.
- 9.2 The OST must be printed onto an official OST form when it is issued to the student, when it is required for external use, or when it is placed in the OSR of a student who transfers to another school in Ontario. The OST must be signed by the school administrator (or Supervisory Officer if the administrator is not available) and sealed with the school or board seal. Upon graduation or retirement, a current and accurate copy of the student's OST (printed on white paper) must be stored in the OSR folder for internal school use. It is a Ministry requirement that the OST be kept for 55 years following graduation or retirement from education in Ontario.
- 9.3 The fee for a copy of your transcript is \$20.00 and \$5.00 for each additional copy (Canadian funds only).

Student Record of Accumulated Instruction in French as a Second Language – Elementary Schools Only

- 10.1 French card calculations will now be processed in the Student Information System.
- 10.2 This card will be established and maintained for each elementary student enrolled in a French as a Second Language program.
- 10.3 The French card must be printed from the SIS and placed in the OSR before it is sent out to another board or to the Gr. 9 feeder school.

11. Security of The Ontario Student Record

- 11.1 All parts of the OSR must be stored in lockable filing cabinets in areas of restricted access.
- 11.2 Filing cabinets must be secured at times outside of normal office hours. If possible, the filing cabinets will be kept in rooms with lockable doors.

- 11.3 The OSR files shall remain in the school at all times except if removed temporarily to be taken to a meeting sanctioned by a Supervisory Officer or the Principal.
- 11.4 When removing the OSR from the filing cabinet, a sign out form see Appendix B must be completed to track who removed the OSR, along with the date. Schools may use placeholder cards to ensure the OSR is returned to the proper filing location to ensure the OSR is not misfiled.

12. Transfer of the OSR

- 12.1 All Transfers
- 12.2 All original components of the OSR, including the Documentation Folder, are transferred when a student registers at another publicly funded school in Ontario.
- 12.3 Office Index Cards will be printed and stored at the departing school for 55 years, according to recommended best practice.
- 12.4 If a student transfers after having attended the sending school for more than six weeks from the commencement of the reporting period, the sending school will prepare a report card for the student during the next reporting cycle and forward it to the receiving school.
- 12.5 Requests for the OSR must be received in writing and must contain the name of the student, the name of the receiving school, the receiving school's BSID number and the first date the student attended classes at the new school. E-mail requests are acceptable. Written requests for the OSR should be signed, dated and retained for audit purposes for the current school year + 2 years.
- 12.6 The sending school will complete Part B of the OSR folder, indicating the date of transfer, and will review the contents of the OSR.
- 12.7 If some or all of the information in the OSR has been digitized (e.g. scanned into an electronic document management system) and if the receiving school is capable of receiving this information in digitized form in such a way that the OSR can be effectively reproduced or viewed, the information may be transmitted to the receiving school in digitized format in advance of the paper parts of the OSR.
- 12.8 If a school is transmitting OSR information electronically, arrangements must be made to ensure the secure and confidential transfer of the information.

13. Transfers within the Board

- 13.1 When schools are sending a large number of OSRs for students proceeding to a feeder school within the Waterloo Region District School Board, the OSRs, along with a computer printout listing the students in alphabetical order, are to be sent to the feeder school using the year-end transfer process via Board courier. OSRs shall not be transferred until requested by the feeder school. On the day the computer printout and OSRs are received, the receiving school administrator must verify the list against the OSRs received, sign and date the printout, and retain it in a file for the current school year + 2 years.
- 13.2 OSRs sent as part of the mass transfer process for students who do not arrive in September at the designated receiving school need to be returned to the sending school within 16 days of the start of the school year. The OSR needs to be returned to the sending school so that the destination can be accurately recorded. However, if a secondary school in which a student actually registers requests the OSR from the secondary school where the OSR

- resides (before that OSR has been returned to the sending elementary school), then the secondary school informs the sending elementary school of the transfer.
- 13.3 "One off" OSRs (i.e. not mass-transfers to feeder schools) must not be sent until the student is in attendance in that school. The exception to this would be students who have been selected to attend a specialized program where their enrolment is guaranteed (i.e. an area class). In this case, often because of the special needs of these students, it is permissible to send the OSR prior to the first day of attendance, if requested by the receiving school.
- 13.4 Individual OSRs that were not transferred prior to the end of the school year should not be forwarded until September, following the receipt of an OSR request indicating that the student is in attendance at that school. To ensure prompt and accurate delivery, ensure that OSRs are not sent over the summer months when schools are closed.
- 13.5 The OSR and related documentation must be transferred completely and securely to a specific individual through the Board's courier service, in envelopes or containers designed for this purpose. The envelopes are available at no charge to schools from the Purchasing website and transfer containers are delivered to schools just prior to the end of the school year. Further information is available through the Single-Source Resource.

14. Transfers to another Board in Ontario

- 14.1 The OSR of students transferring to schools outside the Board, but within Ontario, will be transferred only on receipt of a written request for the OSR from the receiving school. The original OSR must be transferred using a secure transportation method that can be tracked, will maintain confidentiality and guarantee prompt delivery. Check the Purchasing website for information on the courier currently under contract with the Board.
- 14.2 Principals may use Form <u>IS-00-E</u> when requesting an OSR from another school in Ontario.

15. Transfers to Private. Federal or First Nation Schools within Ontario

15.1 If the receiving Ontario school is a private school which is inspected by the Ministry of Education (i.e. they have a BSID number and issue Ontario Education Numbers (OENs) to their students, the written request will express agreement to accept responsibility for the OSR and to manage it in accordance with the Ministry OSR Guideline. This request requires a written statement signed by the parent/guardian/adult student indicating consent to the transfer. The original OSR must be transferred using a secure transportation method that can be tracked, will maintain confidentiality and guarantee prompt delivery. Check the Purchasing website for information on the courier currently under contract with the Board.

If the school is not inspected by the Ministry of Education, then treat the school as if it is outside of Ontario. The Ministry of Education website lists the schools which have been inspected. The Single Source Resource has the exact URL.

15.2 Principals may use Form <u>IS-00-E</u> when requesting an OSR from another school in Ontario.

16. Transfers to an Educational Institution Outside of Ontario

16.1 Original OSRs are not transferred outside Ontario.

An exact copy will be sent only on receipt of a written request from the school. In addition, written consent of the parent/guardian/adult student is required. The exact copy of the OSR

- must be transferred using a secure transportation method that can be tracked, will maintain confidentiality and guarantee prompt delivery. Check the Purchasing website for information on the courier currently under contract with the Board.
- 16.2 Principals may use Form <u>IS-00-G</u> when requesting school records from a school or school board outside of Ontario. The parent/guardian/adult student must sign the form authorizing the transfer.

17. Retirement of an OSR

- 17.1 Retirement of the OSR occurs when a student ceases to be enrolled in school. Temporary withdrawal and transfers to another school in Ontario are not to be confused with retirement.
- 17.2 Enter the date of retirement in Part C of the OSR folder.
- 17.3 When a student retires from a school due to graduation, the school will provide a copy of their final Ontario Student Transcript. Students who retire from school prior to graduation may have a copy of their transcript, within one year of leaving, upon request.

18. Retention and Storage of the OSR

- 18.1. The active OSR files shall be stored in a central location in the school. They must be stored in a locked filing cabinet or in a locked, access-restricted area.
- 18.2 The entire contents of retired elementary students' OSR are retained at the school for 15 years in a separate, secured location from the active OSRs. After 15 years have elapsed, during the annual collection in June, the entire OSR is sent to the Education Centre. The OSR will be digitized into the Electronic Document Management System and kept for 40 additional years.
- 18.3 The entire contents of retired secondary students' OSR are kept for 5 years at the school, in a separate, secured location from the active OSRs. After 5 years have passed, everything except the final Ontario Student Transcript is culled from the OSR and securely shredded. During the annual collection in June, the culled OSR is sent to the Education Centre. The culled OSR will be digitized into the Electronic Document Management System and kept for 50 additional years.
- 18.4 In the event of a school closure, contact the Freedom of Information, Privacy and Records Information Management Officer at ext. 4409 for specific instructions.

19. Correction or Removal of OSR Information

- 19.1 A parent/guardian/adult student may make a request to correct, or have removed, information contained in the OSR if it is inaccurately recorded or if it is not conducive to the improvement of the instruction of the student.
- 19.2 If the principal agrees to the request, the material is to be corrected or removed from the file and destroyed or returned to the parent/guardian/adult student. If the request is granted, no record of the request is to be retained in the OSR.
 - If the principal refuses to comply with such a request, the parent/guardian/adult student may request in writing that the principal refer the request to the appropriate supervisory officer. The supervisory officer will review the information in question and either request the principal to remove the information, in which case no record of the request will be retained

in the OSR or submit the OSR and the request to a person designated by the Ministry of Education for adjudication.

20. Information Pertaining to the Youth Criminal Justice Act:

Principals shall ensure that no OSR discloses, directly or indirectly, the contravention or alleged contravention by a student of any statute or regulation to which the *Youth Criminal Justice Act* or Part V-A of the *Provincial Offences Act* applies, or the disposition of any proceedings brought under those statutes or regulations. For example, the record of a request for information from a correctional institution, probation officer or officer of the law or of the Ministry of Correctional Services should not be retained in the OSR folder. Instead, it should be kept in a confidential school file and destroyed after two years.

21. Change of Name

21.1 Change by Repute

When a pupil is known by a surname other than the pupil's legal name, and when the principal is satisfied that the name is obtained by repute and that its use is in the best interest of the pupil, the principal will, at the written request of the parent/guardian/ student, record the requested surname of the pupil. The requested surname, with the legal surname enclosed in brackets after the requested surname, will be recorded on the OSR folder. The "preferred name known as" and legal names will also be recorded in the appropriate fields within the Student Information System (SIS) database. The written request will be placed in the Documentation Folder

21.1.2 If a student wishes to be known by a gender other than that which appears on the birth certificate, and if it is deemed by the parent/guardian/ student in consultation with the principal of the school that it is in the best interest of the pupil, the principal will, upon written request, record the requested gender of the pupil. The preferred name of the student can be recorded in the "known as" name section in the SIS.

Proper documentation will be required in order to change the legal name(s). The report card can be printed with the "known as" name and sent home with the student. A copy of the report card in the "known as" name will be attached to a copy of the report card in the legal name and filed in the OSR. If the student acquires proper source documentation with a name change and gender change, then the name change will also be recorded in the legal name field in the SIS.

21.2 Change by Marriage

- 21.2.1 The request will be accompanied by a legal document, such as a marriage certificate, which establishes that the student's surname has been changed either by marriage or in accordance with the law of the province, state, or country in which the document was issued.
- 21.2.2 A verification of the principal's knowledge of the document will be placed in the Documentation File, along with the request. A copy of the marriage certificate is not retained.
- 21.2.3 The new surname will be recorded in the student information system and will appear on all future documents.

21.3 Change by Law

- 21.3.1 When a principal receives a document (i.e. a legally changed birth certificate) that establishes a student has had "their" surname or gender changed by law (i.e. adoption or divorce), the principal will file a verification of his/her knowledge of the document in the Documentation File. Do not put a copy of the legal document in the OSR.
- 21.3.2 In the case of a name change, at the request of the parent/guardian/student, the principal will change the name of the student on all components of the OSR. All records, including electronic documents (SIS), will appear as if originally established in the new surname. No trace of the old name will be visible.
 - Note: White-out, striking lines through, etc. are not acceptable, especially if by holding the document to the light one can read it from the reverse. In some cases, the document must be reproduced in its entirety.
- 21.3.3 In the case of a gender change, all records, including electronic documents (SIS), will appear as if originally established in the current gender. No trace of the previous gender will be visible. White-out, striking lines through, etc. are not acceptable, especially if by holding the document to the light one can read it from the reverse. Particular care must be taken to ensure that secondary courses which are gender-specific (i.e. physical education) are changed to reflect the current gender. In some cases, the document must be reproduced in its entirety.

22. Office Index Card (OIC)

- 22.1 The Office Index Card provides school personnel with access to information about a student that attended their school. A PDF file will be produced annually according to established best practice. Prior to printing, the student management system must be updated with the date of the request for the OSR, the destination of the student and the date on which the OSR was transferred. The PDF file will be sent to the Ed Centre Imaging Department for ingestion into the electronic document management system. The electronic files will be kept for 55 years. The OIC must contain the date of transfer/retirement and the destination location.
- 22.2 OIC information, whether it exists electronically or in printed form, is subject to the same criteria regarding access and security as all other components of the OSR.