

Administrative Procedure 1110

RECORDS MANAGEMENT

Responsibility: Chief Information Officer

Legal References: Municipal Freedom of Information and Protection of Privacy Act

Related References: AP 1100 - MFIPPA

AP 4750 - Archival Records

AP 4770 - Secure Disposition of Records

Revisions:

Reviewed: August 2016

1. Preamble

The following procedures provide guidelines and expectations regarding the management of records, including off-site storage.

2. General

- 2.1 The management of records and the Board's Records Retention Schedule will assist staff in determining what documents must be kept, the location where they are to be stored (on-site or off-site), and the length of time they are to be retained prior to disposal.
- 2.2 All records of the institution are subject to the *Municipal Freedom of Information and Protection of Privacy Act*, and other privacy laws.
- 2.3 Records Management procedures are coordinated through the Freedom of Information, Privacy and Records Information Management Officer.

3. Glossary of Terms

- 3.1 Archival Record a record of on-going historical or evidential value that is kept permanently once the original operational need for the record has ceased. This includes minutes of public meetings, including steering, standing and advisory committees, Board policies, specific financial records, and other documents that are required to be kept permanently in accordance with legislation.
- 3.2 Legal Hold the retention of records beyond their normal retention as a result of litigation, Freedom of Information or other legal requirements. Legal holds are placed on records in consultation with the Freedom of Information, Privacy and Records Information Management Officer.
- 3.3 Legislated includes records with retention periods that are determined by legislation, such as minutes of Board and Committee meetings, financial statements, Ontario Student Records, timetables and schedules, courses of study, employee records, leases and agreements, property records, and accounts receivable.
- 3.4 Non-Legislated includes records with retention periods that are determined by the Board, such as donations to schools, job descriptions, property damage, student enrolment, facility bookings, student accommodation planning.

- 3.5 Off-Site Storage a record that is indicated in the Records Retention Schedule as requiring off-site storage in the Board's Archive Room (Education Centre, Building 4).
- 3.6 On-Site Storage a record that is referenced or used on a regular basis and is stored in the department or school for the period of time indicated in the Records Retention Schedule.
- 3.7 Record any original recorded information, regardless of physical form or characteristics, created or received in the course of doing business that constitutes the official version of the information. Records may be paper, electronic (including e-mail), microfilm, photographs, maps, audio, data and/or video recordings. It does not include copies of publications such as books and journals. Temporary working papers such as rough notes and informal drafts are considered transitory records (see 3.9).
- 3.8 Record Retention Schedule outlines in detail the legislated and non-legislated retention requirements for official records that are held by the Responsible Site. It does not apply to any copies. It identifies the length of time a record must be retained as "on-site" or "off-site" before destruction. A copy of the current Board Records Retention Schedule can be accessed electronically through the Records Management System program and can be found on the Board's website.
- 3.9 Transitory Records these are records which are required for a limited time to complete a routine action, are used in the preparation of final records, or are retained as information or convenience copies by offices or individuals who do not have primary responsibility for them. Examples of transitory records include: working documents, agendas and minutes held by other persons other than the committee chair/secretary, copies of records retained when the original is sent to another site for processing (e.g. copies of invoices when the original is sent to Financial Services), printouts or extracts from databases, "cc/bcc/fyi" copies kept only for convenience or information, announcements and notices of a general nature, routine e-mails to schedule or confirm meetings or events.

4. Records Management System

- 4.1 The Records Management System (RMS) is a program developed in-house by WRDSB software developers. It is designed to allow schools and departments to electronically record groups of paper records, and automatically apply appropriate retention periods to those records. The RMS system will also calculate the destruction date and print labels and other reports. Labelled boxes can be stored in the Education Centre Archive Room until such time as the destruction date is passed.
- 4.2 If access is required to the Records Management System, the Freedom of Information, Privacy and Records Information Management Officer at ext. 4409 should be contacted for further instructions.

5. Records Retention Schedule

- 5.1 The Records Retention Schedule provides a records-keeping plan for the Board and dictates how to keep each type of record found within the system. The plan gives direction to the life cycle of the record, and the schedule takes into account any legal or statutory regulations concerning the retention of particular types of records.
- 5.2 The Board's Records Retention Schedule is available electronically through the Records Management System and on the Board's website.
- 5.3 The length of retention in the Records Retention Schedule should be strictly followed. Keeping records beyond their required retention makes the records available for search and discovery during a Freedom of Information or litigation request. Adhering to the document retention outlined in the Board's official Records Retention Schedule provides proof for the courts or other tribunals

- that the Board's retentions are followed as part of the normal course of business, and that documents may not be discoverable if their normal retention date has passed.
- 5.4 Existing records that become subject to legal hold for litigation, Freedom of Information or other purposes are removed from the normal records retention schedule. These records are retained until the legal hold is removed. After the legal hold is removed, the records revert to their normal retention schedule. Additional information on legal holds can be found in Administrative Procedure 4040 ("Placing Records on Legal Hold").

6. Archive Room

- 6.1 The Board maintains an Archive Room in Building 4 at the Education Centre for paper record storage. This room contains all the permanent records of the Board, such as Board and committee minutes; records from closed schools, and also provides temporary storage for records entered into the Records Management System whose destruction date has not yet passed.
- Records should not be placed into the Archive Room without first being entered into the Records Management System and a label identifying the contents and the destruction date affixed to the box.
- 6.3 Access to the Archive Room is restricted to specified individuals. To obtain access, the Freedom of Information, Privacy and Records Information Management Officer should be contacted.

7. Records Maintained in Electronic Format or on Other Media

- 7.1 Records maintained in electronic format, such as e-mail messages and information housed in databases like the Trillium Student System, IPPS or finance systems, are considered to be official records of the Board.
- 7.2 Records on microfilm, such as copies of Ontario Student Record folders, are also considered official records. The retention for records on microfilm is specified in the Board's Records Retention Schedule.

8. Electronic Documents Management

- 8.1 Records which have been entered into an Electronic Documents Management System (EDMS) by a department, where the EDMS is considered to be the official repository of records for that department, will automatically have retention applied to the records when they are entered into the system. Unless a legal or other hold is applied to the record, the records will be identified for deletion at the appropriate time. The retention for these records is determined according to the Board's Records Retention Schedule.
- 8.2 Records contained in an EDMS take the place of paper copies of the records and have the same legal standing as if they were paper.

9. Destruction of Records

- 9.1 Schools should ensure that records are disposed of according to the procedures outlined in Administrative Procedure 4770 - Secure Disposition of Records. Records containing personal or confidential business information should be cross-cut shredded or otherwise disposed of in a manner that renders the information irretrievable.
- 9.2 At least once per year, the Freedom of Information, Privacy and Records Information Management Officer arranges for the secure destruction of records in the Archive Room whose destruction date has been reached.