



Waterloo Region
District School Board

Administrative Procedure 1110

RECORDS INFORMATION MANAGEMENT

Responsibility: Freedom of Information, Privacy and Records Information Management Officer

Legal References: [Education Act](#)
[Child, Youth and Family Services Act](#)
[Municipal Freedom of Information and Protection of Privacy Act](#)
[Personal Health Information Protection Act](#)
[Personal Information Protection and Electronic Documents Act](#)
[Workplace Safety and Insurance Act](#)
[Youth Criminal Justice Act](#)

Related Resources: [Board Policy 1015 - Records Information Management](#)
[Ministry of Education Ontario Student Record \(OSR\) Guideline](#)
[Administrative Procedure 1100 - Privacy Protection and Access to Information](#)
[Administrative Procedure 1102 - Freedom of Information Request Protocol](#)
[Administrative Procedure 1050 - Ontario Student Record and Office Index Card](#)
[Administrative Procedure 4000 G-Suite Communications Archiving](#)
[WRDSB Privacy/Records Management Guide](#)
[WRDSB Records Retention Schedule](#)

Effective Date: March 2021

Revisions:

1. Preamble

Records Information Management (RIM) is the systematic management of all records created or received at any site operated by the Waterloo Region District School Board to their final disposition (destruction or archival retention). Record keeping practices must comply with the Municipal Freedom of Information and Protection of Privacy Act. All general information in the custody and control of the Board, that is not confidential, or otherwise exempt, shall be publicly accessible.

2. Index

For guidance on required records information management practices, refer to the following sections of this procedure:

Section 3.	Goals and Objectives
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Section 10.	Records Retention Schedule
Section 11.	Secure Disposition/Destruction of Records/Legal Hold

3. Goals and Objectives

Maintaining a Records Information Management (RIM) program facilitates the following:

- Timely, relevant, and accurate management of information to support the provision of programs and services that best meet students' needs;
- Support informed decision-making and policy development, and effective, efficient, and trustworthy program and service delivery;
- Support transparency and accountability;
- Support access to and privacy of information in accordance with legislation and policies;
- Record and manage business decisions and transactions that preserve corporate memory; and
- Support access to information for legal purposes.

The objectives of the Records Information Management (RIM) program include:

- Ensuring a consistent and coordinated approach to records management by establishing policy, standards, practices, and tools that reflect organizational needs;
- Establishing a records management framework that supports organizational goals and objectives and supports student needs;
- Establishing processes that ensure that information is accurate, reliable, trustworthy, and authentic; has a context and is able to serve as evidence; and supports accountability;
- Building staff awareness and understanding of and commitment to managing information assets and protecting privacy and confidentiality at all levels of the organization;
- Improving control and security through providing audit trails of document activities, ensuring their use as reliable information assets;
- Establishing an integrated, organization-wide solution for managing electronic information;
- Developing a staff training strategy to build records management skills;
- Developing and implementing standards to support the identification, location, and retrieval of information;
- Developing a strategy for the long-term management (migration) and preservation of information assets;
- Assessing progress in improving the management of information in the organization

4. Definition of a Record

Record means any information in printed form, on film, by electronic means or otherwise, and includes:

- a. correspondence, a memorandum, a book, a plan, a map, a drawing, a diagram, a pictorial, or graphic work, a photograph, a film, a microfilm, a sound recording, a videotape, a machine readable record, any other documentary material, regardless of physical form or characteristics, and any copy thereof, and
- b. any record that is capable of being produced from a machine readable record under the control of an institution by means of computer hardware and software or any other information storage equipment and technical expertise normally used by the institution.

4.2 **Transitory records** are records that hold no further value to the school board beyond an immediate or minor transaction, or records that may be required only for a very short time, perhaps until they are made obsolete by an updated version of the record, or by a subsequent transaction or decision. Examples of transitory records include notices of meetings, routine notices or memos regarding holidays or special events circulated to all staff or posted in public folders; insignificant or inconsequential information items concerning routine administrative or operational matters, daily student work/ assignments, and personal messages and information.

5. Responsibilities

All Board employees are responsible for the records and information they create and maintain to support the business operations of the Board. They must ensure compliance with the Board's policy and procedures in the management of Board records.

This procedure applies to all records and information within the custody or under the control of the Board, including those records and information relating to the operation and administration of the Board and those records and information relating to employees and students individually.

Each department and school is responsible for supporting the RIM program by ensuring that the Board's records information management policy and procedures are applied.

- 5.1 **Schools** - Schools are responsible for the effective management of records created and/or used at the school, including office records, student records, staffing information, teaching resources.

OSR records - The Ontario Student Record (OSR) is the record of a student's educational progress through the schools in Ontario. The [Ministry of Education Ontario Student Record Guideline](#) sets out the types of records that are to be contained in the OSR. It contains both personal and education-related documents such as report cards. Additional types of records may be included in OSRs over and above the types of records set out in the Guideline. The basic criteria for the inclusion of records in the OSR is that the information is "considered to be conducive to the improvement of the instruction of the student." The Ministry OSR Guideline also sets out the criteria for managing OSR access, use, maintenance, transfers, retirement, retention, storage, correction, destruction, and removal of information. WRDSB OSR best practices can be accessed via the OSR Procedure 1050.

Non-OSR records (retained outside of the OSR) include all other types of personal information that a board/school may collect about a student including, but not limited to, permission slips for students to attend field trips, class lists, records of marks for weekly tests, photographs of students including names, and honour rolls.

- 5.2 **Departments** - The Board's administrative departments:
- manage all hard copy and electronic records and information (including audio, video, tapes, etc.) according to Board policy and procedures, and applicable federal and Ontario legislation;
 - 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 department file plan developed from the Board classification scheme;
 - ensure that appropriate access and security processes ensure that appropriate access and security processes are in place to protect both paper and electronic records;
 - apply the records and information retention schedules and securely dispose of records in accordance with those schedules; and
 - 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 the Board's policy.

5.3 **WRDSB Privacy/Records Office**

This office:

- acts as a central repository for records which are not frequently needed but must be retained for a number of years;

- receives inactive Ontario Student Records (OSRs) from secondary schools five years after students' retirement/graduation; secondary schools purge the OSR in accordance with the Ministry of Education's OSR Guideline; the Records Clerk prepares and scans the remaining records (OSR folder and Ontario Student Transcript) to the WRDSB electronic document management system where they are retained for an additional 50 years (total 55 year retention);
- issues certified copies of the Ontario Student Transcripts and diplomas for former WRDSB students;
- is responsible for responding to record requests related to inactive students;
- is responsible for overseeing an inventory of the Board's archival/historical records (see section 6. below) and responding to requests for access to these records;
- is responsible for reviewing the Board Records Retention Schedule annually to ensure it complies with any changes in federal and provincial legislation and guidelines.

The Freedom of Information, Privacy and Records Information Management Officer is responsible for overseeing the activities of the Privacy/Records Office and its staff.

6. Archival/Historical Records

6.1 Archival records are unique in that they often have significant evidential, historic or research value and can provide a record of the activities of a body of individuals (i.e. a student body or an elected Board of Trustees). Archival records can be divided into two categories:

- *archives*, which are records of significance and are generally paper-based, and
- *artifacts*, which include three-dimensional objects such as uniforms, trophies, equipment, furniture, paintings, etc.

6.1.1 Records such as Office Index Cards and Ontario Student Records are not considered archival as their retention is specified by the *Education Act*.

6.1.2 Archives are managed by the site responsible for creating them. The archives at the Education Centre are managed by the Freedom of Information, Privacy and Records Information Management Officer.

6.1.3 There are three main types of archival records:

- **Non-personally identifiable:** this would include school records such as flyers, dance posters, instructional materials etc. that do not identify individual people, and could include three-dimensional artifacts.
- **Identifiable, but public or created for a consistent use and purpose:** this would include such items as Board and Board Committee minutes; copies of local or school newspapers; yearbooks; memorabilia from anniversaries; or team, class or staff photos, and could include artifacts.
- **Identifiable, with personal information:** these records would include school registers, class lists and any other documents that allow for the identification of specific individual(s).

6.2 Determining What to Keep

6.2.1 Legislated archival records must be kept for the appropriate retention specified in the legislation. Once that retention has been reached, the records can either be flagged for destruction or a determination can be made whether there is on-going historical or research value in keeping a selection of the records.

6.2.2 Archive records that record the activities of a school or of the Board that do not have a legal retention requirement need to be evaluated for their on-going historical or research value. Often, retaining a representative sampling of these

materials is sufficient to illustrate the activity being identified. Questions regarding the appropriateness of retaining certain materials can be directed to the Freedom of Information, Privacy and Records Information Management Officer.

6.3 Proper Storage of Archive Records

- 6.3.1 When determining an appropriate location for the storage of archival records, consideration should be given to locations that do not experience extremes of temperature. The records should be placed out of direct sunlight and thought given to locations that are free of insects or other pests. Records should be stored off the floor, in case of flooding. As much as possible, a location that considers both fire safety and also the potential for water damage in case of a fire would be appropriate.
- 6.3.2 Care should be taken to avoid storing archives with other, modern materials. New materials, such as plastics, can give off gases which can hasten the deterioration of old records.
- 6.3.3 As many archival materials are very fragile, care should be taken when handling these materials. Wear gloves whenever possible, as the oils from skin can damage the records.

6.4 Disposition of Archival Records

- 6.4.1 If some of the archival collection is more than 75 years old, if it is beginning to show signs of extreme deterioration, and/or if the quantity of archives has exceeded the physical space allocated for their retention, then schools or departments may wish to consider moving the archival materials to a local museum or historical society that can assist with their proper preservation. The Freedom of Information, Privacy and Records Information Management Officer at records@wrdsb.ca should be contacted to discuss the records in the collection and how to contact the local archivists who may be interested in the school's collection.
- 6.4.2 When considering a donation of archival records to local archivists, consideration needs to be given to the *Municipal Freedom of Information and Protection of Privacy Act*, which states: "Personal information does not include information about an individual who has been dead for more than thirty years." Because this may be difficult to determine, the Archives of Ontario suggests that records containing personal information could be made available 100 years after the date of creation. Therefore, the records need to be divided into the three categories identified in section 6.1.3 above: "non-personally identifiable"; "identifiable, but public or created for a consistent use and purpose"; and "identifiable, with personal information".
- 6.4.3 Records which are listed as "identifiable, with personal information" may not be made available to the general public until 100 years after the date of the creation of the record.

7. Electronic Records

- 7.1 Electronic files cover a broad range of data and include any named grouping of data such as word processing files, email, directories, spreadsheets, databases, or lists of file names. The same issues when dealing with paper documents, such as scheduling, disposal, and storage also apply to electronic/machine readable records. They are

governed by the statutes that apply to the access, retention, and destruction of all public records.

- 7.2 Electronic imaging will be done for series of records which are well organized and will not consequently require extensive reorganization prior to imaging, 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 should not be done where the original records are poorly organized or are illegible. Records with a retention of 7 years or greater may be imaged, e.g. OSRs, employee files, permanent financial records, Board/Committee agendas, and minutes.
- 7.3 To ensure that the information in electronic formats is accessible, work sites/schools will record the following on the outside of the disk, tape, or container:
- description of the data;
 - name of the system on which the medium is to be used;
 - name and version number of the application software;
 - capacity and density of the media;
 - recording date(s);
 - security precautions and access restrictions;
 - type of copy (storage, working, back-up, etc);
 - any special attributes;
 - any other pertinent information regarding the data stored.
- 7.4 The need to maintain electronic records should also be taken into consideration when upgrading software or hardware throughout the system. Electronic files, particularly those designated as permanent records, must be migrated onto the new technology and stored in a stable environment.

8. Electronic Document Management

- 8.1 Documents that are housed in an Electronic Document Management System (EDMS) are considered to be the definitive record of the activities of a school or department and have the same value as a paper record.
- 8.2 When records are entered into the EDMS, appropriate retention is automatically applied to the records. Records are flagged for destruction at the appropriate time and human intervention is required before the records are permanently deleted.

9. Vital Records Plan

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. Once identified and duplicated, the record copies are to be kept in a separate and safe location as determined by the department/school administrator.

10. Records Retention Schedule

- 10.1 The Records Retention Schedule outlines retention of the Board's records according to their administrative, fiscal, legal, and research/archival value. It includes records that must be retained according to legislation and/or Board procedures and a notation of the archival/historic importance of each record series where appropriate. The schedule applies to both paper, electronic records. The Schedule excludes all reference, resource and library material such as books, articles, and external publications which are not official records of the Board, as well as transitory records for which their purpose has been served.

- 10.2 All recorded information must be identified in a Retention Schedule and must not be destroyed or removed from the control or custody of the Board except as authorized in the schedule. Additional records may be stored at the discretion of the principal or department supervisory officer/designate. For access and privacy purposes, there should be only one complete official retention copy of each record. Back-up copies should 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.
- 10.3 Electronic records will be backed up in accordance with the schedule developed by Information Technology Services.
- 10.4 At the time of storage, a label indicating the disposal date should be affixed to the record or box of records before it is stored to facilitate destruction per the retention schedule.
- 10.5 The Schedule excludes all reference, resource, and library material such as books, articles, and external publications which are not official records of the Board.
- 10.6 The process for maintaining the Board's retention schedule is to:
- train staff in record retention procedures;
 - establish a regular schedule for disposal of records, normally once a year;
 - review the retention schedule on a regular basis and update as required.
- 10.7 The Record Retention Schedule is a "living" document. Updates and revisions to both the nature of records retained and the retention periods applied to them continuously evolve. It is the responsibility of the Freedom of Information, Privacy and Records Information Management Officer to ensure the retention schedule is routinely reviewed and revised to accommodate these updates.

11 Secure Disposition/Destruction of Records/Legal Hold

- 11.1 Records should be reviewed yearly for disposal including electronic and other viable media records, and in accordance with the Board's Records Retention Schedule. This includes all relevant back-up tapes and hard drives.
- 11.2 Transitory records may be destroyed after their use has been served, e.g. in the case of student work, once a mark or indication of mastery has been made. Most electronic/voice mail and telephone transitory messages are considered short-term records and should 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.
- 11.3 If not already disposed, duplicate records and temporary working papers such as rough notes or informal drafts are to be destroyed at the time the official records are destroyed since they should not outlive the documents that resulted from them.
- 11.4 Records containing confidential and/or personal information must be handled securely when storing, maintaining, transferring, or destroying them. They are to be destroyed in such a manner that they cannot be read, interpreted, or reconstructed.
- 11.5 In general, the school/department that created or authorized creation of a record is responsible for its retention and disposal, including records stored electronically. To avoid overloading the storage capacity on a server, the Information Technology Services department may eliminate records after advising the users and allowing a reasonable time for them to destroy the record or make other arrangements for storage.
- 11.6 In the event of a school closure/consolidation, the Principal and school secretary will work with the Freedom of Information, Privacy and Records Information Management

Officer to ensure proper management and storage of student, administrative, and archival records.

- 11.7 If there is a potential, pending, or ongoing lawsuit, investigation or audit, or records are required in response to a formal Freedom of Information Request under MFIPPA, these documents will be retained beyond the approved retention requirement set out in the Records Retention Schedule until further notice. This is referred to as a **legal hold** and such records may not be destroyed until the legal hold has been removed. Once a request for information is received, the Freedom of Information, Privacy and Records Information Management Officer shall request that any documents that may be relevant to the request be put on legal hold until the request is satisfied. This request may supersede normal records retention practices. If the information has already been destroyed, following current records retention processes, this should be noted. Upon resolution of the request for information, staff will be informed that the legal hold may be removed. At this point, normal records retention practices apply.

11.8 **School Records**

11.8.1 When disposing of records held by schools, each record must be reviewed to determine if it contains any personal or confidential business information. General records not containing personal information may be placed in the appropriate recycling container for regular disposal. Paper records believed to contain personal or confidential business information (e.g. name, address, education or medical or financial information) must be shredded or destroyed in a manner that renders the information contained in the record to be irretrievable. Details about [shredding services](#) as provided by the WRDSB Distribution Centre can be accessed on the staff website

11.8.2 Ontario Student Record (OSR) folders for elementary students that have retired from public education in Ontario are retained at the school for 15 years following the retirement date. Secondary student OSRs are retained at the school for 5 years following retirement or graduation. After that time, the OSR is appropriately culled according to the OSR Guidelines published by the Ministry of Education and is sent to the Records department for imaging. After imaging, the original file is sent to the Archive Room at the Education Centre, and is destroyed during the next regular destruction cycle. The microfilm image is kept for 55 years.

11.9 **Education Centre Records**

11.9.1 Records created by various departments within the Education Centre may need to be retained in that department for a period of time after the records are no longer in active use. Following this period, the box of records must be entered into the Records Management System, and a label affixed to the box indicating, among other things, the contents of the box and the destruction date for the records. The box may then be sent to the Archive Room for storage. Questions around whether records should be scanned to the electronic document management system must be discussed with the Freedom of Information, Privacy and Records Information Management Officer.

11.9.2 The Archive Room at the Education Centre contains the Board's collection of permanent records (i.e. meetings of Board minutes and records from closed schools), as well as providing temporary storage for records that have been entered into the Board's Records Management System. Boxes should not be placed in the Archive Room without first entering them into the Records Management System and affixing the appropriate label. Access to the Archive Room is arranged through the Board's Freedom of Information, Privacy and Records Information Management Officer.

11.9.3 On an annual basis, the Freedom of Information, Privacy and Records Information Management Officer will arrange for the destruction of records from the Archive Room that are eligible to be destroyed. This is generally accomplished at the end of August or in early September.

11.10 **Records in Non-paper Format**

11.10.1 Records also exist in many forms that are not paper-based (e.g. email, electronic document management system, microfilm, computer backup tapes, data warehouses, computer hard drives, external drives, etc.) all contain records of the Board and need to have appropriate retention applied to them. Once the retention period has passed, these records need to be destroyed in a non-retrievable manner, according to the official retention schedule.

11.10.2 If an automatic schedule cannot be created to manage the disposition of non-paper records, then regular review must take place to ensure that records are not retained beyond that indicated in the Records Retention Schedule.

11.10.3 External storage media such as CD or BlueRay discs, memory sticks or thumb drives, personal communication devices (such as cell phones or personal data assistants) may also contain records. Once the retention period or operational need for this information has passed, or the device no longer works, these media records also need to be destroyed in a manner which renders the information on them irretrievable.

11.10.4 Non-paper storage media can be destroyed in an irretrievable manner such as breaking/scratching or sent in a secure container to the Distribution Centre. This media should not be mixed with paper materials and the bin must be clearly marked that it is "non-paper shredding". Details about [shredding services](#) as provided by the WRDSB Distribution Centre can be accessed on the staff website.