SECURE DISPOSITION OF RECORDS

Responsibility: Director of Education

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

Related References: AP 1100- MFIPPA
                    AP 1110 -Records Management
                    AP 4040 -Placing Records on Legal Hold
                    WRDSB Record Retention Schedule
                    AP4750 - Archival Records

1. **Preamble**

The following procedure provides guidelines and expectations regarding the secure disposition of records containing personal or sensitive organizational information.

2. **General**

2.1 All records of the institution are subject to the Municipal Freedom of Information and Protection of Privacy Act, and other privacy laws.

2.2 Records that are subject to legal hold as per AP 4040 (Placing Records on Legal Hold) fall outside the normal retention schedule and may not be destroyed until the legal hold has been removed.

2.3 Staff must consult the Board’s Record Retention Schedule, which can be found in the “Policies and Procedures” section of the Board website, for detailed information on how long records must be kept before they can be destroyed (http://www.wrdsb.ca/staff/policyprocedure/?page_id=308).

2.4 According to the Board’s Records Retention Schedule, schools are required to store copies of yearbooks and other memorabilia as a record of the activities of the school. Other records that no longer have functional use within the organization, but have historical or research value, should be kept by the site as archival records. Administrative Procedure 4750 addresses the handling of archival records.

3. **School Records**

3.1 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 cross-cut shredded and/or destroyed in a manner which renders the information contained in the record to be irretrievable. Other types of storage media (CDs, hard drives, memory sticks etc.) must be also be destroyed in an irretrievable manner such as breaking, scratching, pulverizing etc.

3.2 Grey shredding bins are available by contacting the Distribution Centre at ext. 4259. These bins must be used for secure paper shredding where the quantity is greater than can be accommodated by small office shredders. Full bins are secured and returned to the Education Centre with the courier. Until the bins are full, they should be placed in a limited-access room that can be locked, to prevent unauthorized access to the contents.
3.3 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 Microfilming 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.

4. **Education Centre Records**

4.1 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. If due to legal or organizational necessity the information is required to be microfilmed, the box may be forwarded to the Microfilming department for imaging before being forwarded to the Archive storage room. Questions around whether records should be microfilmed must be discussed with the Freedom of Information, Privacy and Records Information Management Officer.

4.2 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.

4.3 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.

5. **Records in Non-paper Format**

5.1 Records also exist in many forms that are not paper-based. E-mail archives, microfilm, computer backup tapes, data warehouses, computer hard drives and external drives, among others, 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. 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.

5.2 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 also need to be destroyed in a manner which renders the information on them irretrievable.

5.3 Non-paper storage media can be sent in a secure container (i.e. a grey bin) 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”.
6. **Electronic Documents Management**

6.1 Documents that are housed in an Electronic Documents Management System (EDMS) are considered to be the definitive record of the activities of a school or department and should have the same value as a paper record.

6.2 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.