



GSUITE COMMUNICATIONS ARCHIVING

Responsibility:	Superintendent of Student Achievement and Well-being Freedom of Information, Privacy and Records Information Management Officer
Legal References:	Municipal Freedom of Information and Protection of Privacy Act
Related References:	Administrative Procedure 1110 - Records Information Management Administrative Procedure 4060 - Board E-Mail Protocol Administrative Procedure 1104 - Privacy Breach Protocol Administrative Procedure 1102 - Freedom of Information Request Protocol Administrative Procedure 4070 - Responsible Use Procedure for Information, Communication, and Collaboration Technologies WRDSB Records Retention Schedule WRDSB Privacy/Records Management Guide
Revised:	March 2021
Reviewed:	December 2011, December 2019

1. Preamble

The following procedure provides information regarding the archiving of electronic mail messages created in the WRDSB GSuite for Education. As stated in Administrative Procedure 4060 - Board Email Protocol, the use of email to conduct Board business and facilitate student learning is a common practice. The Waterloo Region District School Board provides email accounts to staff and students as a normal and regular part of account creation.

2. General

- 2.1 GSuite communications, including Gmail, Google Hangouts Chat, Google Hangouts Meet, and Google Groups, are electronic media used by WRDSB staff and students to transfer information; however, they are not intended to be used as repositories for official board records.
- 2.2 With the exception of student messaging, all content sent or received through WRDSB Gmail accounts is considered an official board record and, therefore, falls under the *Municipal Freedom of Information and Protection of Privacy Act*, and other laws that set out rules for access to general government records and privacy protection for personal information collected by government institutions.
- 2.3 Under the *Municipal Freedom of Information and Protection of Privacy Act* or other regulations, records of the organization, including electronic records, may be subject to search and disclosure.
- 2.4 To meet the Board's legal obligation to respond to requests for information in a complete and timely manner, all content in Gmail is archived in Google Vault.

- 2.5 All archived content is subject to formal Freedom of Information requests, or internal/legal investigations related to misconduct. Access to Google Vault is restricted to identified WRDSB staff, including the Freedom of Information, Privacy and Records Information Management Officer.
- 2.6 Records that are subject to legal hold (i.e. are required for the purposes of a legal investigation or Freedom of Information request) fall outside the normal retention schedule and may not be destroyed until the legal hold has been removed.
- 2.7 Staff are reminded of some best practices to consider when using e-mail: respecting individual privacy, keeping the tone and contents of messages professional, replying only to those who need to see the message, and ensuring personal information is not posted in public conferences. [Administrative Procedure 4060 - Board E-Mail Protocol](#) and [Administrative Procedure 4070 - Responsible Use Procedure for Information, Communication, and Collaboration Technologies](#) can provide additional guidance.

3. School Staff Retention - Five Years from Creation Date

- 3.1 Messages will be retained in Google Vault, as well as in Gmail, Google Hangouts Chat, Google Hangouts Meet, and Google Groups for five years from their creation date and then deleted.
- 3.2 If messages include attachments, the attachments will also be deleted; however, if messages contain links to files stored in a Google Drive, the messages and links will be deleted, but the files in Google Drive are not affected.

4. Retention for WRDSB students

- 4.1 This retention period for WRDSB students will remain at 2 years, the effective date is August 31, 2020.

5. Communications Requiring Longer Retention based on Content

- 5.1 The Waterloo Region Education Centre Staff will have unique GSuite Communication Retention periods applied to reflect current required retention periods for paper and digital records as set out in the WRDSB Retention Schedule.