

RECORD AND INFORMATION MANAGEMENT

Background

The organization, handling, storage, scheduling and disposal of records must be performed in a standard and consistent manner. It is essential that the proper retention periods be maintained to meet all legal, financial and historical requirements. Any record in the custody of or under the control of the Division, including any record containing personal information, will be maintained, retained and, where applicable, disposed of in a manner consistent with the Freedom of Information and Protection of Privacy Act and the provisions of this procedure.

Definitions

Records and Information Management Program (RIMP) means the practices, procedures, and standards for collecting, classifying, storing, securing, retrieval, access, retention, and disposal of all Division records throughout the life cycle of the record. Administrative Procedures specify how records are consistently managed.

Record means information in any recorded form. This includes but limited to: final documents, letters, hand-written notes, papers, draft documents, e-mail, voice mail, computer data files, books, vouchers, maps, drawings, photographs, student records and calendars in the custody of the Division's designated repositories.

Records Repository is a system or facility that ensures the effective, secure, and compliant storage and management of records throughout their lifecycle.

Records Repository examples includes:

1. Physical Repository Spaces:
 - Archival Storage Rooms (Facilities Building File Storage)
 - Secure File Rooms (Human Resources Filing Room), Central Filing
 - Vaults
 - Off-site Storage Facilities
2. Digital Repository Spaces:
 - Cloud Storage Services (Google Workspace, Atrieve, RYCOR)
 - On-premises Data Centres (Division File Servers)
 - Digital Archives (Records Centre)
 - Document Management Systems (DMS) (Sharepoint)
 - Enterprise Content Management (ECM) Systems (SharePoint)

Retention Schedule or Retention and Disposition Schedule is the timetable that identifies records of the Division, the action that triggers the closure of a record, the length of time a record must be retained before disposition, and the final disposition of records (archives or destroy).

Transitory Records are records that are not required to meet statutory obligations or to sustain administrative or operational functions. These records are still to be handled as “Confidential Information”.

Transitory Records are records in any media that:

- Have only temporary usefulness;
- Are not part of an administrative or operational records series;
- Are not regularly filed in a records information system;
- Are required only for a limited period of time for the completion of a routine action or the preparation of a record; and
- Any files created or stored in Google Workspace are categorized as transitory documents. These documents will be subject to an automatic retention period of 7 years unless a label is applied, calculated from the date of the last modification. This policy ensures consistent management and archiving of our digital records in accordance with our Division's records retention schedule. Refer to AP 185 – Appendix E – Google Workspace Data and Information Management for details on the different labels applied to certain document types. This will come into effect September 2025.

Records Disposition Process is the approved process to prepare records for final disposition for both paper and electronic records. Once the criteria for disposition is met, timely action is taken to implement disposition based on this process. (Refer to Appendix B - Records Disposition Process).

Student Records are specifically subject to the Student Records Regulation under the Education Act and Regulations and are also addressed in Administrative Procedure 320 - Student Records.

- Electronic transitory student records that are kept in the Division's servers retained for thirty (30) days after passing quality assurance on the Provincial Approach to Student Information (PASI).

Personal Information means any information about an identifiable individual, including:

- Name, home address or telephone number;
- Race, national or ethnic origin, colour, religion, political beliefs or associations;
- Age, sex, marital status, family status;
- Identifying numbers;
- Fingerprints or blood type;
- Health and health care history;
- Educational, financial, employment, criminal records.

Procedures

1. Records required for statutory, legal, fiscal, administrative or operational purposes must be retained in a regular records or information system and disposed of separately in accordance with an established retention schedule.
2. All records, regardless of their format (i.e., paper, electronic, e-mail, photo, video, or audio) or location, are the sole property of the Division.
3. Records are generated in the course of daily activity and managed to ensure their authenticity, integrity and reliability.
4. The RIMP shall be applied consistently across the Division and shall apply to both electronic and hard copy records.
5. All staff shall be responsible for maintaining records in accordance with the RIMP and related Administrative Procedures.
6. The RIMP shall apply to all records in all formats regardless of their position in the records management life cycle. The life cycle encompasses the creation, receipt, use, maintenance, storage, and final disposition of all records.
7. The RIMP and the Retention and Disposition Schedule shall ensure that proper custody, storage, access, retention, and disposition of all records in accordance with applicable legislative regulations and industry best practices.
8. The classification of Division records across all sites shall be consistent with the Retention Schedule (Refer to Appendix A – Records Retention Schedule).
9. The retention and disposition of records across the Division shall be consistent with the Retention Schedule (Refer to Appendix A – Records Retention Schedule) developed in accordance with federal and provincial legislation and the Freedom of Information and Protection of Privacy Act.
10. A Records Retention Schedule shall be maintained and updated by the Electronic Records Advisor with the approval from Associate Superintendent, Business and Finance or designate and updated to allow for the disposal of records in a consistent manner.
11. Once records have met their life cycle requirements, the destruction of records is subject to approval by the Electronic Records Advisor based on submitted inventories and procedures. Measures are in place for the secure destruction of all records.
12. Records identified as vital shall be managed and secured to ensure the continuity of mandates in the event of disaster.
13. Records subject to litigations and/or audit shall not begin their retention schedule until the litigation and/or audit is settled or finalized.
14. Except for transitory records and digital assets on the Google Workspace, upon disposal, Form – 185-1 Records Disposition Authorization will be completed and sent to the Electronic Records

Advisor and Associate Superintendent, Business and Finance or designate. Disposal of records can only take place according to the parameters set in the Retention Schedule and Records Disposition Process, refer to AP 185 - Appendix A – Records Retention Schedule and Appendix B – Records Disposition Process. Upon approval, Form – 185-1 Records Disposition Authorization becomes the official Record Disposal Certificate.

See AP 185 – Appendix E - Google Workspace – Data and Information Management for retention and disposition of these digital assets.

15. The Electronic Records Advisor and Associate Superintendent, Business and Finance or designate shall work in coordination with schools and departments on matters related to RIMP.

Reference: Section 33, 52, 53, 56, 68, 197, 222, 225 Education Act
AP 180 – FOIP
AP 192 – Information Security
AP 320 – Student Records
Freedom of Information and Protection of Privacy Act
FOIP Regulation 186/2008
Information Bulletin 3.2.5 – Access to Information
Information Bulletin 3.2.7 – Student Record Regulation Information
Student Record Regulation 97/2019

Form: Form 185-1 Records Disposition Authorization