



ALGONQUIN AND LAKESHORE CATHOLIC DISTRICT SCHOOL BOARD

ADMINISTRATIVE PROCEDURES

RECORDS AND INFORMATION MANAGEMENT (Policy Statement: Records and Information Management)

Purpose

The Algonquin and Lakeshore Catholic District School Board (ALCDSB) operates under the *Education Act* and its associated regulations. The creation and management of Board records and information shall be in accordance with the provisions of the *Education Act*, the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA), the *Personal Health Information and Protection Act* (PHIPA) and other relevant statutes and regulations of the Province of Ontario and the Government of Canada.

References

Education Act and Regulations

Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)

Personal Health Information and Protection Act (PHIPA)

Procedures

The Records and Information Management (RIM) program applies to all records within the custody or under the control of the ALCDSB related to all aspects of Board operations regardless of the medium in which those records are stored and maintained.

- Board employees are responsible and accountable for creating and maintaining accurate records.
- All records and information created, received and maintained in the day-to-day business operations of the Board within ALCDSB departments and schools support the operations of the Board and as such are the property of the Board regardless of the medium in which those records are stored and maintained.
- This refers to those records and information relating to the operation and administration of the Board and to employees and students individually.
- This applies to all business applications and information technology systems used to create, store, and manage records and information including email, database applications, and websites.
- This applies to all Board staff and third party contractors or agents who collect or receive records and information on behalf of the Board.

1. Roles and Responsibilities for Records Management

The Director of Education and Supervisory Officers are assigned the highest level of responsibility for ensuring a successful records management program. This support is translated into the allocation of resources at a lower level. It promotes compliance with records management procedures throughout the organization.

The Director of Education and Supervisory Officers are responsible for establishing, implementing and maintaining a program that manages information optimally and best serves the interest of the School Board, Schools and Community.

The Freedom of Information Officer and IT Department has primary responsibility for implementation and maintaining the records management program. In particular, they establish the overall records management policies, procedures and standards for the organization and implement the process. This includes security controls, designing and implementing systems using information and communication technologies.

- Oversee the records and information management program.
- Facilitating the development of filing systems and maintaining these to meet administrative, legal and financial requirements.
- Establish and maintain documentation, including records inventories, storage information and disposition schedules.
- Conduct periodic audits for compliance with the policy and procedures.
- Oversee the management of records storage areas, ensure that records are properly stored, evaluate records storage equipment and participate in negotiation of vendor contracts and agreements.
- Continue to incorporate all electronic records into the records and information management program.
- Ensure service components (such as archives management, forms management, retention and disposition scheduling, filing systems, legal issues, information security, ethical and quality issues etc.).
- Ensure that appropriate access and security rules are in place to protect both paper and electronic records as required.
- Review and upgrade the Records Management Program.

Principals, Department Managers/Supervisors are responsible for ensuring that their staff create and keep records as an integral part of their work and in accordance with established policies, procedures and standards. They provide the resources necessary for the management of records and liaise with the Freedom of Information Officer and the IT Department on all aspects pertaining to records.

- Create, receive and manage Board records and information to provide details about and evidence of the activities of the Board.
- Manage all records and information regardless of format (paper, electronic, audio, videotapes and microfiche etc.) according to applicable Federal and Ontario laws and Board by-laws and procedures.
- Manage electronic records and information including email records in the Board.
- Maintain records and information according to the department file plan developed from the Board classification scheme.

- Ensure that appropriate access and security rules 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.
- Ensure that all third party organizations, contractors or agents who receive or collect personal information of behalf of the Board are aware of and comply with the records management program.

Staff creates, receives and keeps records as part of their daily work, and should do so in accordance with the records management program policies, procedures and standards; this includes disposing of records only in accordance with the authorized retention schedule.

- Be responsible for all records and information regardless of format (paper, electronic, audio, videotapes, microfiche etc.) according to applicable Federal and Ontario laws and Board by-laws and procedures.
- Apply the records and information retention schedules and securely dispose of records in accordance with the retention schedule.
- Manage electronic records and information including email records in the Board.

2. Identifying Information Requiring Capture

Records identified will be essential to ongoing legal requirements and effective functioning of the Board and will fall into the following categories:

ADM	Administration
COM	Communications and Public Relations
FAC	Facilities Management
FIN	Finance
GOV	Governance and Policy
HUM	Human Resources
ICT	Information and Communications Technology
LEG	Legal Matters
PDD	Program Development and Design
RPL	Research and Planning
STU	Student Services

ADM **Administration** is the function of overseeing the administration of the team and units within the board and schools. Records supporting this function relate to administrative committees' decisions and meetings, and internal administrative support or services. The functions of acquiring and managing equipment, supplies, services and materials for schools.

COM **Communications and Public Relations** is the function of promoting and marketing boards/schools and programs and services. Records in this function include board/school communication and press releases, speeches, websites, public relations activities, events and news releases, materials relating to marketing research, publications and reports.

FAC **Facilities Management** is the function of managing and maintaining board buildings and facilities and supporting capital initiatives and building improvements. Records include maintenance and operations reports, requests and logs, environmental testing of facilities,

equipment maintenance and testing, facilities planning and improvements, capital and non-capital projects, inspection reports, and records relating to property acquisition and disposition, building and office renovations, security, and property management relationships.

FIN **Finance** and accounting is the function of managing board/school financial and accounting resources. Includes establishing, operating and maintaining accounting (payables, receivables, revenue) systems, controls and procedures, financial planning, reporting, preparing budgets and budget submissions, and the monitoring and analysis of capital assets. Records include but are not limited to accounts payable and receivable, budgets, audits, benefits accounting, expense payments, financial reporting, fixed asset management and all matters regarding the allocation and control of funds.

GOV **Governance and Policy** is the function of governing boards/schools and exercising legal authority and control. The corporate governance structure specifies the distribution of rights and responsibilities among different participants in boards/schools, such as the board and staff, and spells out the rules and procedures for making decisions on its affairs. Includes resolutions, bylaws, policies and procedures, charters, board meeting administration, and strategic planning.

HUM **Human Resources** is the function of managing/supporting all employee services within the organization in accordance with policies and procedures. Records include, but are not limited to, personnel records, employee collective agreements, employee information (including medical information), conditions of work, overtime, salary rates, pensions, benefits, payroll records, grievances, performance evaluations and recruitment.

ICT **Information and Communications Technology** is the function of applying and managing Information and communications technology to support the instruction, administration and operational needs of the organization to capture, store, retrieve, transfer, communicate and disseminate information through automated systems such as Wide Area Networks and Local Area Networks. Includes planning, determining requirements, developing acquiring, modifying and evaluating applications and databases, and acquiring, tendering, leasing, licensing, registering and disposition of systems.

LEG **Legal** is the function of addressing legal issues relating to the operations of the board and schools. Records include, but are not limited to, claims and litigation files, appeals and hearings, contracts and agreements entered into on behalf of the board and schools, deeds and titles relating to properties, harassments incidents, etc.

PDD **Program Development and Design** is the function of applying curriculum guidelines and designing education programs for students. Records include but are not limited to proposals, correspondence, lesson plans, and course outlines.

RPL **Research and Planning** is the function of undertaking research and planning to support the ongoing operations of the school and board. Records include, but are not limited to, research surveys, studies and reports which address issues such as school boundaries, student demographics, municipal planning and statistics used to support Ministry funding requests.

STU **Student Services** is the function of providing students with programs and services in accordance with the Education Act. Records cover such areas as admissions, transfers and

withdrawals, Ontario Student Records, guidance and counseling assessments, consent/permission forms for special activities and programs, and extra-curriculum programs and participation.

3. Records Centres and Locations

- (a) School principals and managers/supervisors will be responsible for the effective management of records created and/or used in the school or department.
- (b) Records will be labeled and organized for efficient retrieval and destruction. All boxes being transmitted to an off-site storage facility must be accompanied with a transmittal sheet.
- (c) All records which are not frequently needed but must be retained for a number of years according to the Board's Records Retention Schedule will be stored at an off-site storage facility if insufficient storage space is available at the current location.
- (d) The Principal/Department Manager/Supervisor in conjunction with the Freedom of Information Officer (FOI) will at this point determine whether the records will be stored at an off-site storage facility.

4. Retention Schedule

- (a) The Records Retention Schedule is the official schedule for the ALCDSB. It will outline retention of the Board's records according to their administrative, fiscal, legal, and research/archival value. It will include 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.
- (b) All recorded information will be identified in the retention schedule and will not be destroyed or removed from the control or custody of the Board except as authorized in the schedule.
- (c) Additional records not listed on the Records Retention Schedule will be stored at the discretion of the Principal/Department Manager/Supervisor/Freedom of Information Officer. Many items received for reference purposes are not school records such as booklets, information from other educational institutions or associations.
- (d) The schedule will exclude all reference, resource, and library material such as books, articles, and external publications which are not official records of the Board.
- (e) The users will be responsible for purging, storing, and transferring inactive records according to the procedure as laid out in the Records and Information Management Manual.
- (f) Shredding/recycling paper records will be done through the Board's Contracted Shredding Service.
- (g) The following process will be followed in maintaining the Board's retention schedule:
 - (i) Establish a regular schedule for disposal of records, normally once a year;
 - (ii) Review the retention schedule on a regular basis and update as required;
 - (iii) Train staff in records retention procedures.

5. Retention Process

- (a) For access and privacy purposes, there will be only one complete official copy of each record retained.
 - Back-up copies will 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.
- (b) Electronic material will be backed up in accordance with the schedule developed by Information Technology Services.
- (c) At the time of storage, a label indicating the primary, secondary levels, disposal date and/or retention date will be affixed to the box before it is stored to facilitate destruction per the retention schedule.
- (d) Confidential/Personal Information Records
 - Confidential records and those containing personal information will be treated as such when storing, maintaining, transferring, or destroying them. They will be destroyed in such a manner that they cannot be read, interpreted, or reconstructed according to the terms of the *Municipal Freedom of Information and Protection Privacy Act*.

6. Storage

- (a) The development of a records storage plan will include the short and long-term housing of inactive physical records and electronic information.
- (b) The FOI Officer will maintain Disposition and Transmittal Records. The FOI Officer will help to determine and coordinate what records will be maintained on-site and what records can be moved to an off-site storage facility. Active records are to be maintained at the site they originated in and shall be governed by the retention schedule.
- (c) Records will be labeled and organized for efficient retrieval and destruction.
- (d) Transfer of records from departments and schools will be done by completing a "Records Transfer List" form and with the approval of the Principal/Department Manager/Supervisor / FOI Officer.
- (e) Special consideration will be given to archival information and records on the history of the Board.
- (f) Archival records will be handled with care, and appropriate protective measures will be taken to reduce wear and tear on the records.

7. Disposition for Paper, Electronic, and Film Records

- (a) In general, the school or department that created or authorized creation of a record will be responsible for its retention and disposal, including records stored on a computer.
- (b) Records will be reviewed regularly for disposal including electronic and other viable media records, and in accordance with the Board's Retention Schedule. This includes all relative backup hard drives.

- (c) Duplicate records and temporary working papers such as, but not limited to, rough notes or informal drafts will be destroyed at the time the official records are destroyed as they should not outlive the documents that resulted from them.
- (d) Records which include confidential/personal information or are of a sensitive nature will be destroyed by shredding using an approved cross-cut shredding vendor (Board contracted provider) to ensure the information being destroyed is illegible.
- (e) To avoid overloading the storage capacity on the server, the Information Technology Services will eliminate records after advising the users and allowing a reasonable time for them to destroy the record or make other arrangements for storage.
- (f) Most electronic/voice mail and telephone transitory messages will be considered short-term records and will 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 approved Classification Scheme and Records Retention Schedule.
- (g) The following will be will the process for destroying Board/school records:
 - (i) Staff will refer to the approved retention schedule for time lines.
 - (ii) A Records and Information Management Destruction of Records Form will be made and a copy sent to the Freedom of Information Officer.
 - (iii) A Certificate of Destruction is required from the vendor performing the destruction. Destruction records will be retained permanently in accordance with the Retention Schedule.
 - (iv) The retention schedule will be amended and approved to dispose of a record not listed.
 - (v) In the event of a school closure/consolidation, the Principal will work with the Freedom of Information Officer to complete residual record keeping requirements for student, administrative, and archival records.
 - (vi) If there is a potential lawsuit; investigation or pending audit, related documents will not be destroyed.

8. Records Confidentiality

- (a) Practices will be in place to protect confidential, sensitive, and personal records and information from unauthorized collection, use, disclosure, or destruction in accordance with the provisions of the *Education Act*, the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA), the *Personal Health and Information Protection Act* (PHIPA), the confidentiality requirements of the Ontario Student Record Guideline, the School Board privacy policy and regulations of the Province of Ontario and the Government of Ontario.
- (b) Shredding locked bins will be provided for the disposal of personal and confidential information, as required, through the Purchasing Department.
- (c) Confidential records and those containing personal information will be treated as such when storing, maintaining, transferring, or destroying them. They will be destroyed in such a manner that they cannot be read, interpreted, or reconstructed according to the terms of the *Municipal Freedom of Information and Protection of Privacy Act*.

9. Records Security

- (a) All records will be managed to meet rules of evidence and legal discovery.
- (b) Control arrangements will include provisions for the protection and appropriate use of Records and Information Management to mitigate risks.
- (c) Records and Information Management will be managed to support business continuity and recovery in the event of a disaster.

10. Accessibility

- (a) Access to records internally and outside of the Board will be given priority, while balancing the requirements of business confidentiality, data privacy, and public access.
- (b) Information to support evidence of Communications/FOI actions, and decisions will be routinely recorded and stored.
- (c) Information will be accessible to staff who require it in the performance of their duties and are authorized to access it.
- (d) Information will be shared across the organization and with social agencies in accordance with operational needs and statutory provisions.
- (e) Plans and practices to actively make records available to the public will be in place, and records will be available to the public by request, subject to statutory requirements.
- (f) The procedure for managing official requests is available in the Board Policy and Management Practices in accordance with the *Municipal Freedom of Information and Protection of Privacy Act*.

11. Management of Electronic Records

Objectives

Electronic records are increasing as a percentage of ALCDSB total records volume. Since they exist in a micro-format and a machine is needed to identify, retrieve and read them, managing electronic documents and electronic mail messages (referred to in this procedure as “electronic documents”) calls for requirements different from those that manage paper-based records.

Electronic documents received and created in the conduct of ALCDSB business are considered official records and, as such, may be accessed in response to MFIPPA, litigation, and operations. At the same time, electronic documents that are transitory must be destroyed immediately after their usefulness has expired.

Procedures

This procedure aims to ensure that ALCDSB electronic document practices comply with industry standards and legislation, which include:

- Ensuring that electronic documents are verifiable as evidence (not altered).
- Destroying, with approvals, electronic documents when their use has expired in accordance with the Retention Schedule.

- (a) Electronic records will be governed by the statutes that apply to the access, retention, and destruction of all public records. They will include but are not limited to:
 - computer-generated records and computer database files
 - records transferred (by scanning, fax, data input, imaging etc) from paper or other hard copy files into a computer or document management system
 - records on disk (hard disks, optical disks, etc)
 - other hard copy files into a computer or document management system
 - records on magnetic tape
 - audiotapes and videotapes
 - e-mail and voicemail messages
 - computerized calendar and time management systems
 - facsimile documents received on a computer and stored electronically
 - intranet and internet transmissions
- (b) The need to maintain electronic records will also be taken into consideration when upgrading software or hardware throughout the system. Electronic files, particularly those designated as permanent records, will be migrated onto the new technology and stored in a secure stable area.
- (c) Electronic material will be backed up in accordance with the schedule developed by Information and Technology Services.
- (d) In general, the school/department that created or authorized creation of a record will be responsible for its retention and disposal, including records stored on a computer.
- (e) To avoid overloading the storage capacity on a server, the Information and Technology Services department will eliminate records after advising the users and allowing a reasonable time for them to destroy the record or make other arrangements for storage.
- (f) Most electronic/voice mail and telephone transitory messages are considered short term records and will 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 will fall under the Retention Schedule and must be directed to their appropriate folder based on the Classification Scheme and Records Series they fall into.

12. Email

The electronic mail system is owned by the Algonquin and Lakeshore Catholic District School Board (ALCDSB), and it is to be used for board business. Occasional use of the system for messages of a personal nature will be treated like any other message. The ALCDSB desires to respect the right to privacy of its employees and does not monitor electronic mail messages as a routine matter. However, it reserves the right to access them, view their contents, and track traffic patterns. Furthermore the ALCDSB will inspect the contents of e-mail messages in the course of an investigation triggered by indications of impropriety or as necessary to locate substantive information that is not more readily available by other means.

Within the School Board, each person is responsible for controlling records according to the records management policies. E-mail messages are considered records, and falls into this category.

Before selecting e-mail as a means for communication or document transmission, users should consider

the need for immediacy, formality, accountability, access, security, and permanence. E-mail differs from other forms of communication. It is immediate and informal, similar to a telephone conversation, yet it is more permanent. It is as irrevocable as a hard-copy document, yet easy to duplicate, alter, and distribute.

The ALCDSB reserves the right to monitor employee use of e-mail by system administrators. Employees are reminded that e-mail use is provided primarily for business purposes and not for personal purposes and that employees cannot expect protection of their personal or business-related e-mail correspondence under privacy laws and regulations.

13. Archives

Objectives

The Records Management procedure has been designed to specifically address the establishment of a records management system and in addition, special consideration will also be given to those records identified in the schedule as having archival value. Although no longer required for daily purposes, these records contain information which is of value for both long-term use and for historical reference.

Procedures

- (a) Archival records will have administrative, fiscal, legal, evidential, and/or informational values that deem them to merit permanent retention.
- (b) Archival records will be effectively stored once the original operational need for the record has ceased to ensure that valuable documents are not destroyed.
- (c) Care will be taken in handling and boxing archival records. Adequate descriptions must be made to permit ready access, and appropriate protective measure must be taken to reduce the wear and tear on records that do not have to be consulted often.
- (d) Because of the special attention archival records require, they will be maintained by trained staff.
- (e) Archival retention schedules will be approved by the Freedom of Information Officer. The following list provides general information on the types of records which should be maintained as archival for historical reference:
 - minutes of official meetings
 - Board reports
 - newspaper clippings/scrapbooks/photographs
 - architectural plans/engineering drawings
 - in-house publications/brochures/promotional material and
 - legal documents
- (f) The Freedom of Information Officer will be contacted regarding appropriate legal agreements to donate historical documents and artifacts to an approved archives, local museum or historical society.

14. Vital Records Protection

Objectives

The vital records protection procedures aim to identify those records which are important to ALCDSB and to evaluate the potential risks to the records. A school or department must develop and implement

records-maintenance practices to protect the designated records from various potential risks. Typical hazards include: natural disasters; fire, water, acid or humidity damage; theft; accidental error, misplacement or loss; unauthorized access. These hazards cannot be totally eliminated but can be minimized.

Procedures

For each record series designated as vital and important, the cost and risk of losing the records is compared to the cost of safeguarding the records. The criteria for a vital records series are that one or more of following conditions exists. The records series is:

- Irreplaceable; whereby a reproduction does not have the same value as the original (such as a signed contract).
- Needed in order that money can be recovered promptly.
- Required to expedite the restoration of a critical service.
- Evidence of legal status, ownership, accounts receivable, land title, and/or obligations.

The criteria for an important record are that the record can be replaced, but only at considerable time, expense and labor.

- Direct copying and dispersal to another location onsite or offsite.
- Micro-imaging into film or digital format and dispersal to another location.
- Storage in a fire-protected cabinet.
- Duplication at alternative offices.

The protection method which is the most efficient and cost-effective to maintain, considering staff costs and space, will be selected for each vital and important records series.

The FOI Officer will provide advice and assistance with the analysis of protection methods for vital records.

Appendices

Appendix 1: Records and Information Management Manual

Forms

Form A: Records and Information Management Transmittal Form to Storage

Form B: Records and Information Management Destruction of Records Form

Associated Documents

Approved: May 22, 2012