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RECORDS AND INFORMATION MANAGEMENT (RIM)

1) PURPOSE

Hastings and Prince Edward District School Board operates under the authority of the *Education Act* and its associated regulations. The creation and management of school board records 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.

HPEDSB is committed to instituting and maintaining a comprehensive Records and Information Management (RIM) program for the systematic creation of records and information that are accurate, authentic, reliable, and trustworthy; support accountability; and serve as evidence of school board activities. The RIM program:

- a) supports efficient and effective program and service delivery;
- b) fosters informed decision-making;
- c) facilitates accountability, transparency and collaboration; and
- d) preserves and ensures access, based on security and confidentiality of sensitive material procedures, to records and information in accordance with the laws of Ontario and Canada for the benefit of present and future generations.

2) PRINCIPLES

The RIM program is established in accordance with the following principles:

Accessibility: Records and information will be readily available and accessible to those who need it when they need it.

Accountability and Stewardship: Accountability for managing records and information in the custody and control of the organization is clearly defined, communicated and monitored.

Risk Management: Risks to records and information are managed, and practices and processes are in place to protect information assets.

Usability and Quality Control: Records and information meets the needs of staff and stakeholders. Information is timely, accurate, reliable, relevant, has integrity and is easy to use.

Planning and Coordination: Coordinated planning for records and information management is linked to organizational goals, objectives and financial planning.

Integration: The management of records and information is integrated with program planning and other business processes.

3) SCOPE

- a) RIM applies to all records in the custody or under the control of HPEDSB related to all aspects of its operations, regardless of the medium in which those records are stored and maintained.
- b) Records and information shall be securely maintained for as long as required as stipulated in the Records Retention Schedule.
- c) All employees are responsible and accountable for creating and maintaining accurate records.
- d) All records and information created, received and maintained in the day-to-day business operations of HPEDSB support the operations of HPEDSB and as such, are the property of HPEDSB regardless of the medium in which those records are stored and maintained. This applies to all:
 - i) records and information relating to the operation and administration of schools/ HPEDSB, and to employees and students individually;
 - ii) business applications and information technology systems used to create, store, and manage records and information including email, database applications, and websites; and
 - iii) employees and third-party contractors or agents who collect or receive records and information on behalf of HPEDSB.

4) ROLES AND RESPONSIBILITIES

- a) **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 board, schools and community.
- b) **Freedom of information coordinator, and Information and Technology Services senior manager** have primary responsibility for implementing and maintaining the RIM program. They establish the overall RIM procedures and standards for the organization and implement the process. This includes security controls, and designing and implementing systems using information and communication technologies, as well as the following:
 - i) oversee the RIM program;
 - ii) facilitate the development of filing systems and maintaining these to meet administrative, legal and financial requirements;
 - iii) establish and maintain documentation, including records inventories, storage information and disposition schedules;
 - iv) conduct periodic audits for compliance with HPEDSB policies and procedures;

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- v) 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;
 - vi) continue to incorporate all electronic records into the RIM program;
 - vii) ensure service components, such as archives management, forms management, retention and disposition scheduling, filing systems, legal issues, information security, ethical and quality issues;
 - viii) ensure that appropriate access and security rules are in place to protect both paper and electronic records as required; and
 - ix) review and update the RIM program.
- c) **Principals, managers and supervisors** are responsible for ensuring that their staff create and keep records as an integral part of their work and in accordance with established procedures and standards. They provide the resources necessary for the management of records and liaise with the freedom of information coordinator and on all aspects pertaining to records, including the following:
- i) create, receive and manage records and information to provide details about and evidence of the activities of the school/HPEDSB;
 - ii) manage all records and information regardless of format (paper, electronic, audio, videotapes and microfiche, etc.) according to applicable federal and Ontario laws and HPEDSB policies and procedures;
 - iii) manage electronic records and information, including email records;
 - iv) Ensure Form 3: Records Request Tracking is completed whenever an informal records request is received. Examples of informal requests are non-paid freedom of information requests, such as for transcripts, replacement diploma, or records requested by Canada Revenue Agency, law firms, advocacy or hiring agencies;
 - v) maintain records and information according to the department file plan developed from the HPEDSB classification scheme;
 - vi) ensure that appropriate access and security rules are in place to protect both paper and electronic records;
 - vii) apply the records and information retention schedules and securely dispose of records in accordance with those schedules; and
 - viii) ensure that all third-party organizations, contractors or agents who receive or collect personal information of behalf of the school/HPEDSB are aware of and comply with the RIM program.
- d) **Employees** create, receive and keep records as part of their daily work, and should do so in accordance with the RIM program procedures and standards. This includes disposing of records only in accordance with the authorized retention schedule, as well as the following:

- i) responsible for all records and information they create and maintain, regardless of format (paper, electronic, audio, videotapes, microfiche, etc.), according to applicable federal and Ontario laws and HPEDSB policies and procedures;
- ii) apply the records and information retention schedules and securely dispose of records in accordance with the retention schedule; and
- iii) manage electronic records and information including email records.

7) IDENTIFYING INFORMATION REQUIRING CAPTURE

- a) Records identified are essential to the ongoing legal requirements and effective functioning of HPEDSB. The file classification scheme for Hastings and Prince Edward District School Board is a functional classification scheme.
- b) Records and information will be classified in accordance with the business functions and activities they support and will fall into the following eleven categories, as defined in the Records and Information Management Manual:

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

8) RECORD LOCATIONS/CENTRES

- a) School principals, managers and supervisors are responsible for the effective management of records created and/or used in the school or department.
- b) Records will be labelled and organized for efficient retrieval and destruction.
- c) All records which are not frequently needed but must be retained for a number of years according to the Records Retention Schedule will be stored on-site at the school, department or administrative building responsible for the records. If sufficient storage space is not available at the current location, off-site storage may be considered. The principal, manager or supervisor will consult with the freedom of information coordinator to determine whether the records may be considered for offsite storage.

9) RECORDS RETENTION SCHEDULE

- a) The Records Retention Schedule is the official schedule for HPEDSB. It outlines retention of school/HPEDSB records according to their administrative, fiscal, legal, and research/archival value. It includes records that must be retained according to legislation and/or HPEDSB policies and procedures and a notation of the archival/historic importance of each record series where appropriate.
- b) The retention schedule excludes all reference, resource and library material, such as books, articles, and external publications and information from other institutions which are not official records of HPEDSB, as well as transitory records for which their purpose has been served.
- c) All recorded information must be identified in the retention schedule and must not be destroyed or removed from the control or custody of HPEDSB except as authorized in the schedule.
- d) Additional records not listed on the Records Retention Schedule may be stored at the discretion of the supervisory officer, principal, manager, supervisor or designate.
- e) All users are responsible for purging, storing, and transferring inactive records according to the procedure as defined in the Records and Information Management Manual.
- f) Shredding and recycling of paper records will be done in accordance with HPEDSB procedures.
- g) The process for maintaining the Records Retention Schedule is:
 - 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; and
 - iii) keep employees informed of records retention procedures.

10) RETENTION PROCESS

- a) For access and privacy purposes, only one complete official copy of each record will be 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) At the time of storage, a label indicating the primary and secondary levels and the disposal and/or retention date will be affixed to the storage box before it is stored to facilitate destruction as per the retention schedule.
- c) Confidential records and those containing personal information will be treated as such when storing, maintaining, transferring, or being destroyed. Records 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*.

11) STORAGE/TRANSFER

- a) Records storage includes the short and long-term housing of inactive physical records and electronic information.
- b) Records are to be maintained at the site/location responsible for the records and shall be governed by the retention schedule.
- c) The freedom of information coordinator will determine and coordinate what records will be maintained on-site and what records can be moved to off-site storage.
- d) Transfer of records from departments and schools will be done by completing Form 195-1: Records Transfer. Transfer of the Ontario Student Record (OSR) will follow procedures outlined in the *Ontario Student Record (OSR) Guideline* and Administrative Procedure 312: Ontario Student Record (OSR). For all records transfers, it is recommended that a label be affixed to the outside of the box/envelope stating the following: CONFIDENTIAL STUDENT RECORDS, IMMEDIATE ATTENTION IS REQUIRED.
- e) Records Transfer forms will be retained permanently in accordance with the retention schedule.
- f) Special consideration may be given to archival information and records on the history of HPEDSB.
- g) Archival records will be handled with care, and appropriate protective measures will be taken to reduce wear and tear on the records.

12) DISPOSITION FOR PAPER, ELECTRONIC AND FILM RECORDS

- a) The school or department that created or authorized creation of a record is responsible for its retention and disposal, including records stored on a computer.
- b) Records, including electronic and other viable media records, will be reviewed regularly for disposal, and in accordance with the school boards 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 that include confidential and/or personal information or that are of a sensitive nature will be destroyed by shredding using an approved shredding process to ensure the information being destroyed is illegible.
- e) To avoid overloading the storage capacity on the server, Information and Technology Services will eliminate records after advising the users and allowing a reasonable time for the user 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 contents of the message or any attachments are considered business records, they fall under the approved classification scheme and records retention

schedule.

- g) The following process will be followed for destroying HPEDSB records:
 - i) staff will refer to the approved Retention Schedule for timelines;
 - ii) Form 195-2: Records Destruction will be completed;
 - iii) records destruction forms will be retained permanently in accordance with the retention schedule. Copies may be requested by the freedom of information coordinator to ensure compliance;
 - iv) the retention schedule will be amended and approved to dispose of a record not listed on the retention schedule;
 - v) in the event of a school closure/consolidation, the principal will work with the freedom of information coordinator to complete residual record keeping requirements for student, administrative and archival records; and
 - vi) if there is a potential lawsuit, investigation or pending audit, related documents will not be destroyed.

13) 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*, HPEDSB policies and procedures and regulations of the Province of Ontario and the Government of Ontario.
- b) 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*.

14) RECORDS SECURITY

- a) All records will be managed to meet rules of evidence and legal discovery. If there is a potential, pending or ongoing lawsuit or audit, related records will be retained beyond the approved retention requirement set out in the retention schedule until further notice.
- b) Control arrangements 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.

15) ACCESSIBILITY

- a) Access to records internally and outside HPEDSB 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 other agencies in accordance with operational needs and statutory provisions.
- e) Procedures 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 will be in accordance with HPEDSB policies and procedures and in accordance with the *Municipal Freedom of Information and Protection of Privacy Act*.

16) MANAGEMENT OF ELECTRONIC RECORDS

- a) Electronic records are increasing as a percentage of the HPEDSB 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 calls for requirements different from those that manage paper-based records.
- b) Electronic documents received and created in the conduct of HPEDSB 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.
- c) Electronic document management practices must comply with industry standards and legislation, which includes:
 - i) ensuring that electronic documents are verifiable as evidence (not altered); and
 - ii) destroying, with approvals, electronic documents when their use has expired in accordance with the Records Retention Schedule.
- d) Electronic documents 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:
 - i) computer-generated records and computer database files;
 - ii) records transferred (by scanning, fax, data input, imaging etc) from paper or other hard copy files into a computer or document management system;
 - iii) records on disk (hard disks, optical disks, etc);

- iv) other hard copy files into a computer or document management system;
 - v) records on magnetic tape;
 - vi) audiotapes and videotapes;
 - vii) email and voicemail messages;
 - viii) computerized calendar and time management systems;
 - ix) facsimile documents received on a computer and stored electronically; and/or
 - x) intranet and internet transmissions.
- e) 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 to the new technology and stored in a stable, secure location.
 - f) Electronic material will be backed up in accordance with the backup and disaster recovery schedule developed by Information and Technology Services.
 - g) The school/department that created or authorized creation of a record is responsible for its retention and disposal, including records stored on a computer.
 - h) To avoid overloading the storage capacity on a server, Information and Technology Services will eliminate records after advising the users and allowing a reasonable time for the users to destroy the record or make other arrangements for storage.
 - i) Most email/voicemail 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.

17) **EMAIL**

- a) The electronic mail system is owned by Hastings and Prince Edward District School Board, and it is to be used for HPEDSB business. Occasional use of the system for messages of a personal nature will be treated like any other message. Respect for the right to privacy of employees is acknowledged, therefore HPEDSB does not monitor electronic mail messages as a routine matter. However, HPEDSB reserves the right to access them, view their contents and track traffic patterns. Furthermore, HPEDSB will inspect the contents of email messages during an investigation triggered by indications of impropriety or as necessary to locate substantive information that is not more readily available by other means.
- b) Each person within HPEDSB is responsible for controlling records according to the records management procedures. Email messages are considered records and fall into this category.

- c) Before selecting email as a means for communication or document transmission, users should consider the need for immediacy, formality, accountability, access, security and permanence. Email 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.
- d) Employees are reminded that email use is provided primarily for business purposes and not for personal purposes and that employees cannot expect protection of their personal or business-related email correspondence under privacy laws and regulations.

18) ARCHIVES

- a) This RIM procedure is designed to specifically address the establishment of a records management system. 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 may contain information which is of value for both long-term use and for historical reference. Storage of archival records will be a school/site-based responsibility.
- b) Archival records will have administrative, fiscal, legal, evidential, and/or informational values that deem them to merit permanent retention.
- c) Archival records will be effectively stored at the original site/location once the original operational need for the record has ceased to ensure that valuable documents are not destroyed.
- d) 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.
- e) Archival retention schedules will be approved by the freedom of information coordinator. The following list provides general information on the types of records which should be maintained as archival for historical reference:
 - i) minutes of official meetings;
 - ii) Board reports;
 - iii) newspaper clippings/scrapbooks/photographs;
 - iv) yearbooks;
 - v) architectural plans/engineering drawings;
 - vi) in-house publications/brochures/promotional material; and
 - vii) legal documents.
- f) The freedom of information coordinator must be contacted regarding appropriate arrangements to donate historical documents and artefacts to an approved archives, local museum, or historical society.

19) VITAL RECORDS PROTECTION

- a) The following processes identify records which are important to HPEDSB 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 or hazards.
- b) Typical risks or 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.
- c) 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.
- d) The criteria for a vital records series are that one or more of following conditions exists. The records series is:
 - i) irreplaceable, whereby a reproduction does not have the same value as the original (such as a signed contract);
 - ii) needed in order that money can be recovered promptly;
 - iii) required to expedite the restoration of a critical service; and/or
 - iv) evidence of legal status, ownership, accounts receivable, land title, and/or obligations.
- e) The criteria for an important record are that the record can be replaced, but only at considerable time, expense and labor.
- f) Protection or safeguarding methods could include:
 - i) micro-imaging into film or digital format and dispersal to another location;
 - ii) storage in a fire-protected cabinet; and/or
 - iii) duplication at alternative offices or sites.
- g) 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.
- h) The freedom of information coordinator will provide advice and assistance with the analysis of protection methods for vital records.

Legal references

- *Education Act*, s.171 (1) 38 Records Management; section 265(1) and S.266 Pupil Records, Ontario Student Record (OSR) Guideline
- *Municipal Freedom of Information and Protection of Privacy Act: Information Banks, Access to Records, Retention*
- *Personal Health Information and Protection Act (PHIPA)*

- *The Ontario Evidence Act*

District references

- Administrative Procedure 194: Freedom of Information and Protection of Privacy
- Administrative Procedure 312: Ontario Student Record (OSR)
- Form 195-1: Records Transfer
- Form 195-2: Records Destruction
- Form 195-3: Records Request Tracking
- Records Retention Schedule
- Records and Information Management Manual