Records and Information Management Policy

Adopted: December 15, 2015	**Last Reviewed/Revised:** February 20, 2024

Next Scheduled Review: 2026-2027

Associated Policies & Procedures:
VI-82 Records and Information Management Procedure
I-07 Protection of Privacy
VI-51 Privacy Breach Procedure
VI-81 Privacy Procedure
I-30 Video Surveillance
VI-83 Video Surveillance Procedure
I-43 Use of Technology and Digital Citizenship
VI-62 Use of Technology and Digital Citizenship

Purpose

The purpose of this policy is to outline the information lifecycle requirements for the secure management and preservation of all records and information at the Halton Catholic District School Board (HCDSB), and to promote information efficiency.

Application and Scope

All records and information received, created and maintained within administrative departments and schools support the HCDSB's day-to-day business operations, including:

- Any business process, application and information technology (IT) systems, including algorithmic learning models used to create, receive, store and manage records and information.

- All HCDSB staff and third-party contractors or agents who create or receive records and information on behalf of the HCDSB and who are required to manage all records and information in accordance with HCDSB policies, contracts and relevant legislation.

References

ARMA International – The Principles®

EC-Council Certified Chief Information Security Officer Program, Version 3 (textbook)

Education Act

Gartner Glossary

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

Ontario Student Record (OSR) Guideline

Personal Health Information Protection Act (PHIPA)

Privacy and Information Management (PIM) Toolkit (2018)

Definitions

- **Algorithmic learning model (ALM):** ALMs encompass machine learning and artificial intelligence systems designed to learn from data they are fed and make predictions and/or decisions based on that data.

- **Information Governance (IG):** IG is the security, control, and optimization of information.

- **Information Lifecycle:** is an approach to information management that recognizes that the value of information changes over time and that it must be managed accordingly.

- **Record**: Documented evidence that supports HCDSB and school decisions, regardless of format (e.g. printed form, film, electronic, or sound recording).

- **Retention Schedule:** A list of all the record classifications and their corresponding retention periods.

- **Transitory Records:** Recorded information not required to support decision making; usually includes duplicate copies of official records, correspondence of a personal nature and records retained for reference. Some transitory records may include personal information.

Principles

The Halton Catholic District School Board acknowledges the practical necessity and the importance of establishing and maintaining a comprehensive records information management system conforming to the following Guiding Information Governance Principles:

1. **Accountability:** The Director of Education oversees the HCDSB's records information management (RIM) program and designates authority to appropriate individuals as required.

2. **Compliance:** The HCDSB's RIM program will be constructed to comply with the provisions of the Education Act, the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), Regulation 823 (R.R.O. 1990), Canada Evidence Act, the Ontario Evidence Act,

Child and Family Services Act, Personal Health Information Protection Act (PHIPA), Ministry of Education Ontario

3. **Confidentiality, Integrity and Availability:** The HCDSB's RIM program will be constructed so the information assets generated by or managed for the HCDSB have a reasonable guarantee of protection, authenticity and reliability; and maintained in a manner that ensures their timely, efficient and accurate retrieval.

4. Student Record, (OSR) Guideline, other Federal and Provincial Legislation, the Privacy and Information Management toolkit (2018) and other information management standards.

5. **Retention and Disposition:** The HCDSB's RIM program will maintain its information assets for an appropriate time, considering its legal, regulatory, fiscal, operational, and historical requirements, and securely dispose of that information when it is no longer required in compliance with HCDSB policies, and applicable laws and regulations.

6. **Transparency:** The HCDSB's processes and activities, including its RIM program, will be documented in an open and verifiable manner and available to all personnel and appropriate, interested parties.

Requirements

- This policy applies to all phases of the information lifecycle. It includes creating or receiving, and using, storing, and securely disposing of records and information.

- HCDBS employees must take reasonable steps to ensure their decisions and actions are formally documented and captured.

- All HCDSB records and information are the property of the HCDSB.

- All HCDSB records and information, regardless of format and location, must be classified in accordance with their level of sensitivity and confidentiality, and stored in a secure location for the period of time defined in the HCDSB's records retention schedule.

- When records and information are no longer required, including transitory records and information, they must be securely destroyed, or maintained in a reliable format suitable for long-term preservation.

Responsibilities

Effective information management is critical to the operation of schools and the school board and is a part of every employee's responsibilities.

- **Director of Education**
  The Director of Education is accountable for ensuring there is a records information

management program that complies with the principles of information governance including the required resources to ensure ongoing compliance.

- **Employees and Third Parties**
  All HCDSB employees, including third parties, are responsible for the records and information they create, receive, and maintain to support the business operations of the HCDSB. All HCDSB employees and third parties must take reasonable steps to protect records and information under their access or control.

- **Privacy Records Information Management Office**
  Privacy Records Information Management Office is responsible for the HCDSB's Records Information Management program.

APPROVED: Regular Meeting of the Board

AUTHORIZED BY: _____

                                       Chair of the Board