HALTON CATHOLIC DISTRICT SCHOOL BOARD HCDSB

Procedure No. VI-82

Records and Information Management

Adopted: October 31, 2016	Last Reviewed/Revised: February 5, 2024

Next Scheduled Review: 2026-2027

Associated Policies & Procedures:
I-02 Records and Information Management
I-07 Protection of Privacy
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
VI-51 Privacy Breach Procedure
HCDSB Procedural By-Law

Purpose

Records and Information Management (RIM) is a systematic management of all records and information created or received at any site operated by the Halton Catholic District School Board (HCDSB), to their final disposition. Final disposition is either destruction or archival retention.

Application and Scope

This document describes procedural requirements but does not include step-by-step procedures. It will point readers to internal resources that aid in maintaining a Records and Information Management program, facilitating:

- Timely, relevant, and accurate management of information to support the provision of programs and services that best meet students' needs.

- Informed decision-making and policy development.

- Secure, effective, efficient, trustworthy program and service delivery.

- Transparency and accountability.

- Access to and privacy of information in accordance with legislations and policies.

- Recording and management of business decisions and transactions that preserve corporate memory.

- Access to information for legal purposes.

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.

   - Accountability for creating a record of business decisions and transactions and for maintaining corporate memory is clearly established and monitored.

   - Roles and responsibilities for staff are articulated and understood for all management of information activities.

   - Core competencies relating to managing information are identified and training is provided.

   - Performance of managing information held by the HCDSB.

   - Records management is linked to organizational goals, objectives, and financial planning.

   - Records management is integrated with program planning and other business processes, including project management.

2. **Transparency:** 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.

   - Plans and practices to actively make records available to the public are in place, and records are available to the public by request, subject to the statutory requirements.

   - Information is shared across the organization and with social agencies in accordance with operational needs and statutory provisions.

   - Information to support evidence of communications, actions and decisions is routine recorded and stored.

   - Information is managed throughout its life cycle regardless of format.

   - Rules are established for the organization, storage, retrieval, and destruction of records.

   - Records and information are managed appropriately throughout the entire information lifecycle: creation, capture and collection; organization; storage, access and use; and disclosure and disposition (destruction, archival selection or permanent retention).

   - Plans are in place to leverage the value of records management by combining it with records management from other internal or external sources, in accordance with statutory provisions to improve programs and services.

3. **Confidentiality, Integrity and Availability:** 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.

   - Risks to records management are identified and managed.

   - Practices are in place to protect confidential, sensitive, and personal information from unauthorized collection, use, disclosures, or destruction.

   - Processes and technology supports are in place to ensure appropriate access to records and tracking of who has modified or accessed confidential records.

   - All records are managed to meet rules of evidence and legal discovery.

   - Contractual arrangements include provisions for the protection and appropriate use of records to mitigate risks.

   - Records are managed to support business continuity and recovery in the event of disaster.

   - Processes are in place to ensure that records management is accurate, timely, reliable, and easy to use

   - Information is accessible to staff who require it in the performance of their duties and are authorized to access it.

4. **Compliance:** HCDSB's RIM program will be constructed to comply with the provisions of relevant legislation and information management standards

   - 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 Student Record, (OSR) Guideline

   - OASBO Privacy and Information Management toolkit (2018)

   - ARMA International – The Principles® (Generally Accepted Recordkeeping Principles)

5. **Retention and Disposition:** 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.

   - The Records Retention Schedule will be used to manage HCDSB records and information according to their administrative, fiscal, legal, research and archival value. It will include records that must be retained according to legislation and/or HCDSB procedures and a notation of the archival/historical importance of each record series where appropriate.

- The Records Retention Schedule will be updated in accordance with legislative or other operational changes as required

- Records Information Management will be integrated into succession plans to ensure the capture and maintenance of corporate history.

Requirements

The Records and Information Management program applies to all records in the custody and/or control of the HCDSB related to all aspects of HCDSB operations regardless of the medium in which those records are stored and maintained. Refer to the records information management procedures listed below, available on StaffNet.

Procedures

- Creating/Receiving Records

- Developing a records inventory

- Using the HCDSB's Records Retention Schedule

- Building a File Plan

- Customizing the HCDSB's Records Retention Schedule

- Building a filing system

- Managing Ontario Student Records

- Requesting offsite storage services (includes retrieving records)

- Preparing boxes for offsite storage.

- Scanning paper documents

- Submitting a Destruction of Records Request

- Managing electronic forms

- Implementing a new systems or process

- Requesting access to a new system

- Conducting annual Access Control Reviews

- Classifying Records and Information

- Conducting a vendor security impact assessment

- Conducting a privacy impact assessment

- Identifying and accepting risk

Achieving Believing Belonging

- Using a secure method to share electronic documents

- Using a secure method to collect or receive electronic documents

To access the above procedures, click here.
The above procedures apply to all records and information holdings within the custody or under the control of the HCDSB.

HCDSB and Employee Responsibilities

The HCDSB supports the management of records and information, including electronic and paper records, in a disciplined, coordinated, and strategic manner, and as such, has designated the Director of Education as the official "Head" of the institution as defined in Section 3 (2) of the *Municipal Freedom of Information and Protection of Privacy Act,* (MFIPPA), 1989. HCDSB further delegates the responsibility of the general administration of the Act and operational decision to the Director of Education.

Director of Education and Supervisory Officers

The Director of Education and the 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. They promote compliance with records and information 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 HCDSB, schools and the community.

Principals, Departments Managers/Supervisors

The Principals, Department Managers/Supervisors are responsible for ensuring 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 Privacy, Records and Information Management Department on all aspects pertaining to records and information management.

- Create, receive and manage HCDSB records and information to provide details about and evidence of the activities of the HCDSB;

- Manage all records and information regardless of format (paper, electronic, audio, videotapes and microfiches, etc.) according to applicable Federal and Ontario laws, and HCDSB By-law and procedures;

- Manage print and file records and information in the departmental records as if there is not an electronic content/records management system in place;

- Maintain records and information according to the HCDSB's classification scheme in collaboration with the Privacy, Records and Information Management Department;

- Ensure that appropriate access and security rules are in place to protect both paper and electronic records;

- Apply records and information retention schedules and securely dispose of records in accordance with those schedules and in conjunction with the Privacy, Records and Information Management Department;

- Ensure all third-party organizations, contractors or agents who receive or collect personal information on behalf of the HCDSB are aware of and comply with the RIM program.

Privacy, Records, and Information Management Services

The Privacy, Records and Information Management Services has the primary responsibility for implementation and maintaining a records and information management program. In particular, the establishment of overall records management policies, procedures, standards for the organization and implementing of that process.

- Oversee the records and information management program.

- Facilitating the development of filing systems and maintaining these to meet administrative, legal and financial requirements.

- Develop, implement, and maintain the HCDSB's Records Retention Schedule annually to ensure it complies with any changes in Federal and Provincial legislation and Ministry guidelines on an annual basis. This includes the storage plan for short and long-term housing of inactive physical records and digital information.

- Ensure the preservation of all recorded information on permanent value.

- 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, as they relate to records storage.

- Ensure that appropriate access and security rules are in place to protect both paper and electronic records as required.

- 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.).

- Identify roles and responsibilities for the efficient management of recorded information and provide training to employees.

- Conduct periodic audits for compliance with the policy and procedures.

- Respond to all record requests related to students who have left school more than five years ago (including formal assessments, confirmation of attendance, etc.) as well as all education verifications.

- Review and upgrade the Records Management Program as required and in accordance with appropriate legislative and Ministry guidelines.

Staff

Staff create, receive, and keep records as part of their daily work. Staff will manage records and information in accordance with the RIM policies, procedures, and standards. Staff will:.

- Be responsible for all records and information regardless of format (paper, electronic, audio, videotapes, microfiches, etc.) according to applicable Federal/Ontario laws and HCDSB By-Law and procedures.

- Apply the records and information management retention schedules and securely dispose of records in accordance with the retention schedule.

- Be aware of the Records Management Policy and Procedure, along with their requirements and will ensure ongoing compliance with it.

Accessibility

- Access to records internally and outside of the HCDSB will be given priority, while balancing the requirements of business, confidentiality, data privacy and public access.

- Information to support evident of Freedom of Information actions and decisions will be routinely recorded and stored.

- Information will be accessible to staff who require it in the performance of their duties and are authorized to access it.

- Information will be shared across the organization and with social agencies in accordance with operational needs and statutory provisions.

- Plans and practices to actively make records available to the public will be in place, and records that contain personal information will be available to the public by request, and subject to statutory requirement, such as MFIPPA, PHIPA, etc..

- The procedure for managing official requests is available in HCDSB policies and procedures, available internally on StaffNet, and eternally on the HCDSB and/or school websites, and is in accordance with MFIPPA and PHIPA.

Offsite Records Storage Location

The Halton Catholic District School Board does not have its own Records Centre, however the HCDSB does have a contract with an external party records centre, where all inactive records, such as OSR are sent for long-term storage to the facility.

- School principals and manager/supervisors will be responsible for the effective management of records created and/or used in the school or department.

- Records will be labeled and organized for efficient retrieval and destruction. All boxes being transmitted to an off-site storage facility must be accompanied by a Records Storage Form (see appendix "A") and approved by the Manager, Privacy, Records and Information Management.

- All records which are not frequently needed but must be retained for a number of years according to the HCDSB's Records Retention Schedule will be stored in an off-site storage facility.

- Received inactive Ontario Student Records (OSRs) that are purged from schools will be stored in an off-site storage facility and prepared for long term retention in accordance with the Ministry of Education OSR Guideline.

Records Retention Schedule

- The Records Retention Schedule is described in the HCDSB's Records Management Procedure, and published on StaffNet. It is the official schedule for HCDSB records and information. The Records Retention Schedule outlines the retention periods of the HCDSB's records according to their administrative, fiscal, legal, and research/archival value. It includes records that must be retained according to legislation and/or HCDSB policy/procedures and a notation of the archival/historical importance of each record series where appropriate. The schedule excludes all reference, resource, and library material such as books, articles, and external publications which are not official records of the HCDSB. While transitory records are not addressed specifically on the retention schedule, employees should use the retention schedule as a guide to determine if they are in possession of transitory records that are duplicates of official records. Employees must not retain transitory records longer than official records.

- All official records must be identified on the Retention Schedule and must not be destroyed or removed from the custody or control of the HCDSB, except as authorized in the schedule.

- Records may be stored at the discretion of the principal or department supervisory officer/designate in accordance with retention rules defined on the Retention Schedule.

- For access and privacy purposes, there should be only one complete official retention copy of each record. Back-up copies should be prepared only when there is sufficient need for authenticity of the original record, when they are considered vital records and to provide an ease of access.

- Electronic records will be backed up in accordance with the schedule developed by Information Technology Services.

- At the time of storage, a label indicating the disposal date should be affixed to the record or box of records before it is stored to facilitate destruction per the retention schedule.

- The process for maintaining the HCDSB's retention schedule is to:

  o Establish a regular schedule for disposal of records, normally once a year.

  o Review the retention schedule on a regular basis and update as required.

  o Train staff in record retention procedures.

- The Records Retention Schedule has several columns including:

  o Record Series – the type of records that are normally used in schools and departments.

  o Functional Description – detailed description of the Record Series.

  o Business Activity - the activities are the tasks performed to accomplish the Function e.g. Human Resources (Function), Recruiting (Activity)

  o Accountability – the department responsible for keeping the "official" copy of the record. "Originating" department is where the record comes from or is brought into existence, for example, created or received.

  o Retention Period On-Site – indicated the total length of time the record is to be kept (active and inactive).

  o Retention Period Off-Site – indicate the total length of time the record is kept in off-site storage.

  o Total Retention– total number of years a record must be kept before it may be disposed of.

  o Disposition – identifies what happened to the record at the end of the retention period, for example, destroy, archival review, personal information bank (PIB).

- Retention Codes – listed at the bottom of each page of the retention schedule as follows:

  o P – Permanent – a file with permanent retention period is never destroyed and is stored in a location determined by the Manager, Privacy, Records and Information Management.

  o E – Event – Retention begins once an event or action occurs, for example, the creation of a record, retirement of a student.

  o CY – Current School Year – the record retention begins at the beginning of the school year and is completed at the end of the year. For example, the Records Management listing is created in a school year, it is updated annually however, it is an active

record for the school year and the following year, as a reference, then is moved to inactive storage.

- o   S – Superseded – a document is to be retained until a new version replaces the current one.

- Records Retention Schedule will be updated and revised on an annual basis.

- Identifying Information Requiring Capture – Classification Codes/Categories

Records that are essential to ongoing legal requirements and effective functions of the HCDSB and will fall into the following functional classification codes (categories):

Functional Records Classification Categories	
Function	Description of Records in the Category
ADM	Administration
COM	Communications and Public Relations
FAC	Facilities Management
FIN	Finance
GOV - LEG	Governance and Legal
HR	Human Resources
PDD	Program Development and Design
RD	Research & Development
STU	Student

- **ADM or Administration** is the function of overseeing the administration of the team and units within the HCDSB and Schools. Records supporting this function relate to the administrative committees' decisions and meetings, as well as the internal administrative support or services. The functions of acquiring and managing equipment (including technology software and hardware), supplies, services and materials for schools.

  Technology services includes but is not limited to implementing and managing information and communications technology to support schools and HCDSB operations; managing Wide Area Networks (WAN) and Local Area Networks (LAN). This category includes planning, determining requirements, developing, acquiring, modifying, and evaluating applications and databases, and acquiring, tendering, leasing, licensing, registering and disposition of systems.

- **COM or Communications and Public Relations** is the function of promoting and marketing HCDSB/schools, programs and services. Records in this function include HCDSB/school communications, press releases, speeches, websites, public relations activities, events, and news releases. The category also includes materials relating to marketing research, publications and reports.

- **FAC or Facilities Management** is the function of managing and maintaining HCDSB buildings and facilities, while 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 acquisitions and disposition, building and office renovations, security and property management relationships.

- **FIN or Finance** and accounting is the function of managing HCDSB/school financial and accounting resources. This category 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 & receivable, budgets, audits, benefits accounting, expense payments, payroll records, financial reporting, fixed assess management, and all matters regarding the allocation and control of funds.

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

   Also, includes the function of addressing legal issues relating to the operations of the HCDSB/ authority 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 HCDSB/ authority and schools, deeds and titles relating to properties, harassments incidents, etc

- **HR or 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), and conditions of work, overtime, salary rates, pensions, benefits, grievances, performance evaluations and recruitment.

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

- **RD or Research and Development** is the function of undertaking research and planning to support the ongoing operations of the school and HCDSB. Records in this category 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 or Student Services** is the function of providing students with programs and services in accordance with the *Education Act*. Records in this category include but are not limited to admissions, transfers and withdrawals, Ontario Student Records (OSRs), guidance and counseling assessments, consent/permission forms for special activities and programs, and extra-curriculum programs and participation. These records also include Special Education records, such as CYC, SW or Speech Language, etc. records. A copy of the summary is placed in the OSR, while more fulsome records are held by the service that provided the summary report.

Records Retention Schedule and Process

- All employees will use the retention schedule to ensure there will be only one complete official copy of each record retained.

- At the time of storage, a label indicating the primary, secondary levels, disposal date, and/or retention date/period will be affixed to the box before it is stored to facilitate destruction per the retention schedule.

- All labels will be obtained from the Privacy, Records, and Information Management Department.

Storage

- The development of a records storage plan will include the short and long-term housing of inactive physical records and electronic information.

- The Manager, Privacy, Records and Information Management will maintain the Disposition and Transmittal Records. The Manager, Privacy and RIM will determine and assist in the coordination of which records will be maintained on-site and what records can be moved to an off-site storage facility. Active records must be maintained at the site they originated from and will be governed by the Retention Schedule.

- Records will be labeled and organized for efficient retrieval and destruction.

- Transfer of records from departments and schools will be done by completing a "Records Storage Form" and with the approval of the Principal/Department Manager/Supervisor and the Manager, Privacy, Records and Information Management.

- Special consideration will be given to archival information and records on the history of the HCDSB.

- Archival records will be handled with care, and appropriate protective measures will be taken to reduce the wear and tear on the records.

Archival/Historical Records

- Although Records and Information Management procedures have been designed to specifically address the establishment of a records management system, special consideration is also given to those records identified in the HCDSB's retention schedule as having archival value.

- These records, although no longer required for daily administrative purposes contain information which is of value for the long-term use as well as for historical reference. The archival program will effectively store records which are to be kept permanently once the original operational need for the record has ceased to ensure that valuable documents are not destroyed.

- Requests to submit archival records must include either the original owner of the record or documentation to support efforts undertaken to identify the original owner.

- Archival records must include reliable evidence supporting the who, what, when, and why something happened as it relates to the records. This is referred to as Records Providence.

- Care must be taken in the handling and boxing of archival records. Adequate descriptions must be made to permit ready access and appropriate protective measures must be taken to reduce the wear and tear on records that do not have to be consulted often. Because of the special attention archival records require, they will be maintained by trained staff. Archival retention schedules must be approved by the Manager, Privacy, Records and Information Management Department.

- The following list provides general information on the types of records which should be maintained as archival for historical reference:
    o Minutes of Official Meetings of the Board of Trustees;
    o Board Reports;
    o Yearbooks;
    o Architectural Plans/Engineering Drawings;
    o In-House publications (for example, Director's Annual Report);
    o Legal Documents;
    o Student enrolment registers prior to and including 1969-1970 school year.

- Enrolment registers pre-1970, particularly those in the late 1800's and early 1900's are the only record of a student's elementary and secondary school education. These were replaced by the OSR folder and Attendance Registers in the mid-1900's which are governed by the

Ministry of Education's OSR procedures. The Manager, Privacy, Records and Information Management is responsible for the long-term storage and retention of these records.

- Arrangements for the donation of historical documents and memorabilia to local museums or historical/heritage societies, are the responsibly of the Manager, Privacy, Records and Information Management. Each donation must be accompanied by a Deed of Gift contract developed and signed by the Manager, PRIM and the recipient.

Electronic Records

- Electronic files cover a broad range of data and include any named grouping of data such as word processing files, email, directories, spread sheets, databases or lists of file names. The same issues when dealing with paper documents, such as scheduling, disposal and storage apply to machine readable records.

- Microfilming or other forms of electronic imaging will be done for records that are too fragile to be used on a regular basis. Records with a remaining retention of ten years or greater may be imaged, such as OSRs, employee files, permanent financial records, HCDSB/Committee agendas and minutes.

- To ensure that the information in electronic formats is accessible, work sites/schools will record the following on the outside of the media:
  - o Description of the data
  - o Name of the system on which the medium is to be used
  - o Name and version number of the application software
  - o Capacity and density of the media
  - o Recording date(s)
  - o Security precautions and access restrictions
  - o Type of copy (storage, working, back-up, etc.)
  - o Any special attributes
  - o Any other pertinent information regarding the data stored.

- The need to maintain electronic records must also be taken into consideration when upgrading software or hardware throughout the system. Electronic files, particularly those designated as permanent records, must be migrated onto new technology and stored in a stable environment.

Email

Halton Catholic District School Board owns the electronic mail system, commonly referred to as email. Its purpose is to facilitate seamless electronic communication serving HCDSB business.

While the HCDSB will allow employees to occasionally send and receive personal email, employees are reminded that occasional use of the system for messages of a personal nature will be treated like any other message. The HCDSB respects the right to privacy of its employees and does not routinely monitor email messages. However, it reserves the right to access them, view their contents, and analyze traffic patterns using a designated technical resource. Furthermore, the HCDSB will inspect the contents of email messages during an investigation triggered by indications of impropriety or other legal or regulatory requests.

Within the HCDSB, each person is responsible for controlling records according to the records management policies. Email messages are considered records and fall into this category.

Before selecting email as a means for communication or document transmission, users should consider the need for immediacy, formality, accountability, access, security, and permanence. Remember that 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. Most importantly, under privacy laws and regulations, all email correspondence, including occasional personal communication, could be exposed to external parties. Therefore, employees cannot expect protection of their personal or business-related email correspondence.

Vital Records Plan

A Vital Records Plan will be developed to identify and protect those records that are vital to getting the system up and running immediately after a disaster, for example, water damage, fire damage. It will include a pre-arranged set of scenarios for dealing with system records and back-up copies of vital records. Once identified and duplicated, the record copies are kept in a separate and safe location as determined by the Department/School Administrator. The location of all back-up material will be reported to and maintained by the Finance Department.

Disposal for Paper, Electronic and File Records

- Records should be reviewed yearly for disposal including electronic and other viable media records, and in accordance with the HCDSB's Retention Schedule. This includes all relevant back-up tapes and hard drives. Shredding records will be done through the HCDSB's contracted shredding service. A certificate of destruction will be provided to the HCDSB and become a permanent record. The following will be the process when requesting disposal of paper, electronic and file records:

  1. Staff will refer to the approved retention schedule for timelines.

  2. A request for disposal form noting the appropriate destruction will be made and a copy sent to the Privacy and Records Management Department. This will include a complete list of the records including the retention period and destruction date.

  3. Disposal of official records of the HCDSB must be approved by the Supervisory Officer, Treasurer and Director of Education

- Transitory records may be destroyed after their use has been served, for example, in the case of student work, once a mark or indication of mastery has been made. Most electronic/voice mail and telephone transitory messages are considered short-term records and should be disposed of as soon as their purpose have been served. However, if the content of the message or any attachments are considered business records, they fall under the Retention Schedule.

- If not already disposed of, duplicate records and temporary working papers such as rough notes or informal drafts are to be destroyed at the time the official records are created as they should not outlive the documents that resulted from them.

- Records containing confidential and/or personal information must be handled securely when storing, maintaining, transferring or destroying them. They are to 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.*

- In general, the school/department that created or authorized creation of a record is responsible for its retention and disposal, including records stored on a computer. To avoid overloading the storage capacity on a server, the Information Technology Services department may eliminate records after advising the users and allowing a reasonable time for them to destroy the record or make other arrangements for storage.

- In the event of a school closure/consolidation, the Principal and the School Secretary will work with the Privacy, Records and Information Management Department to ensure proper management and storage of student, administrative and archival records.

- It there is a potential, pending, or ongoing lawsuit, investigation or audit, related documents will be retained beyond the approved retention requirement set out in the Records Retention Schedule until further notice.

APPROVED: Regular Meeting of the Administrative Council

AUTHORIZED BY: _____

Director of Education and Secretary of the Board