



Niagara Catholic District School Board

RECORDS AND INFORMATION MANAGEMENT POLICY

ADMINISTRATIVE OPERATIONAL PROCEDURES

600 – Business Services

Policy No 600.2

Adopted Date: March 31, 1998

Latest Reviewed/Revised Date: December 20, 2022

PURPOSE

Records and information are evidence of business activity and important assets of an organization and therefore must be managed appropriately in order to maximize their value. All records and information created, received and utilized by the Niagara Catholic District School Board are managed in accordance with these Administrative Operational Procedures.

SCOPE

This set of procedures applies to all employees, Trustees, and volunteers who use, produce, and collect records and information on behalf of the Board.

DEFINITIONS

Archival Record

A record of ongoing or historical value that is kept permanently once its original operational need has ceased. Examples include; Board meeting minutes, school trophies, plaques and photos.

Electronic Record

Records originally created and stored in electronic format. Examples include; emails, information stored in Student Information systems and Human Resources Services systems.

Electronic Document and Records Management (EDRM)

Tools, techniques, and technologies for controlling and organizing information designated as records and documents stored electronically.

Historical Value

A determination by senior management of records that possess value in documenting the history of the organization and are thus worthy of permanent preservation.

Legislated Record

Records with retention periods that are determined by legislation. Examples include; Board and Committee meeting minutes, financial statements, and Ontario Student Records (OSR).

Non-records

“Non-records” include, but are not limited to library and reference materials, publications and forms, extra copies for convenience, duplicate microfilm, transitory records, and personal papers.

Official Record

A record created, collected and/or received in the course of regular board business that serves as evidence of business decisions, actions, and transactions. In some cases this is referred to as a ‘Master’ record.

Operational Record

Records created for the purpose of carrying out the core functions of an organization.

Records and Information Management (RIM)

Records and Information Management is the systematic control of all records, regardless of media type, from their creation or receipt, through their processing, distribution, organization, storage and retrieval to their disposition.

Record

A “record” means any record of information however recorded, whether in printed form, on film, by electronic means or otherwise. Examples of records include; correspondence, a memorandum, a book, a plan, a map, a drawing, a diagram, a pictorial or graphic work, a photograph, a film, a microfilm, a sound recording, a videotape, a machine readable record, any other documentary material, regardless of physical form or characteristics, and any copy thereof (Municipal Freedom of Information and Protection of Privacy Act).

Record Owner

Staff who have direct responsibility for records produced in the area they manage, including but not limited to Principals in schools, and Managers in support functions (Human Resources Services, Financial Services)

Information Classification System and Records Retention Schedule

A document that lists: (1) individual records grouped under a series, (2) which department in the organization has accountability for the record, (3) the minimum total length of time each record must be retained, (4) the final disposition (archival or destruction) of the record, and (5) a legal citation reference.

Retention Period

The prescribed amount of time a record is to be retained or maintained in normal circumstances while there is legal, fiscal or operational value of the record. This time period is often considered the minimum time but may be given as the maximum period of time.

Transitory Records

“Transitory Records” are records that hold no further value to the school board beyond an immediate or minor transaction, or records that may be required only for a very short time, perhaps until they are made obsolete by an updated version of the record, or by a subsequent transaction or decision. Examples of transitory records include notices of meetings, routine notices or memos regarding holidays or special events circulated to all staff or posted in public folders; insignificant or inconsequential information items concerning routine administrative or operational matters; daily student work/assignments, and personal messages and information.

Vital Record

A record that is fundamental to the functioning of an organization and necessary to continue the operations, without delay, under abnormal conditions.

PRINCIPLES OF RECORDS AND INFORMATION MANAGEMENT

The Records and Information Management program is established and administered in accordance with the following principles:

1. **Accountability:** The Director of Education designates authority for Records and Information Management to the appropriate role as required. The organization adopts policies and procedures to guide personnel and ensure that the program can be audited.
2. **Transparency:** The Board’s business processes and activities, including its RIM program, shall be documented in an open and verifiable manner, and that documentation shall be available to all personnel and appropriate interested parties.
3. **Integrity:** The Board RIM program will be constructed so the information assets generated by or managed for the organization have a reasonable guarantee of authenticity and reliability.

4. **Protection:** The Board RIM program will be constructed in a manner to ensure an appropriate level of protection to information assets that are private, confidential, privileged, or that otherwise require protection.
5. **Compliance:** The Board RIM program shall be constructed to comply with applicable laws, other binding authorities, and the organization's policies.
6. **Availability:** The Board will maintain its information assets in a manner that ensures their timely, efficient, and accurate retrieval.
7. **Retention:** The Board will maintain its information assets for an appropriate time, taking into account its legal, regulatory, fiscal, operational, and historical requirements.
8. **Disposition:** The Board will securely dispose of information assets no longer required to be maintained, in compliance with applicable laws and Board policies and Administrative Operational Procedures.

RECORDS AND INFORMATION MANAGEMENT STEPS

1. **Creating records:** Records are regularly created and received or collected as part of ongoing operations at Niagara Catholic District School Board. Records serve as evidence of daily organizational transactions, decisions, and actions. Schools and individual departments create records daily.
2. **Records Classification:** Classification links records to their organizational function by associating them with a record series. This is achieved via a [Records and Information Management Classification System & Retention Schedule](#) developed for use by all Board staff. Examples of records classification includes the following:
 - Documentation and correspondence pertaining to students referred for Speech and Language support is a type of record classified under the *Student Services* record series;
 - Criminal background checks/documentation is a type of record classified under the *Human Resources Management* record series;
 - Banking documentation is a type of record classified under the *Financial Management* record series.

To initiate a request for a new record to be added to the Schedule, the requestor must contact the office of the Privacy and Risk Advisor.

3. **Access Control:** All information under the Board's control will be readily available and accessible for as long as it is required, with access restricted to board employees (or authorized individuals) that require it to perform job duties. All information is managed to protect privacy and confidentiality.

Instances of access to records may need to be recorded, depending on the records requirements identified for the organizational activity and the risk associated with the activity. Examples include; signing out OSRs and other hard copy student files.

4. **Records Storage:** Records, regardless of format or media, should be stored in a way that protects them from unauthorized access, change, loss or destruction, including theft and disaster. This means that the following measures should be strongly considered:
 - a) Physical records (active and inactive):
 - should be stored in a clean, dry area, and avoiding areas where conditions are damp and or humid and may be prone to infestation;
 - should be covered at all times (stored in file cabinets or boxes);
 - if in file cabinets, the cabinets should be lockable in areas with controlled access;
 - that are deemed extra sensitive or highly confidential should be stored in fire-proof cabinets in areas with controlled access.

- b) Digital records: Measures are already implemented; however, they serve as a reminder of good digital security practices such as user authentication, computer time-outs, firewalls, anti-virus software.
5. **Use and Reuse:** Records should be useable and readable for as long as they are retained. Measures for ensuring continued usability may include the following:
- a) Where necessary, creating additional copies of records or converting them into alternative formats;
 - b) Preparing a plan to ensure continued access and usability of records in the event of a disaster affecting records systems or storage areas;
 - c) Establishing routine monitoring of storage conditions.
6. **Disposal and Destruction:** Disposal and destruction of record must follow these steps:
- i. staff must refer to the [Records and Information Management Classification System & Retention Schedule](#) for minimum retention periods for each type of record.
 - ii. once a record is timed for destruction as per the schedule, the department/school/Board site must submit a Records Disposition Authorization Form for the Destruction/Transfer to Storage/Archival Storage of Records (Appendix A), to the Coordinator of Information Management/Privacy and Freedom of Information for approval that the documents have met the minimum retention period.
 - iii. the approval will be communicated to the department/school/Board site that the record can be destroyed. A certificate of destruction must be received from the service provider and retained;
 - iv. Appendix A, and the certificate of destruction will be retained permanently by the Coordinator of Information Management/ Privacy and Freedom of Information.
 - v. for the annual review of Ontario Student Records (OSR), the completion of Appendix A is not required by schools.

In the event of a school closure/consolidation, the principal will work with the Coordinator of Information Management/Privacy and Freedom of Information to complete residual record-keeping requirements for student, administrative and archival records.

Records Maintained in Electronic Format

Records maintained in electronic format include the following:

- email messages;
- file/storage management systems (Google Drive);
- document management systems (DocuShare);
- student information systems (Edsembli);
- payroll and human resources systems (IPPS); and
- financial systems (Microsoft Dynamics NAV).

These are considered to be official records of the Board and have the same legal standing as if they were paper. These records are to be retained per the [Records and Information Management Classification System & Retention Schedule](#).

ROLES AND RESPONSIBILITIES

- All employees, trustees, and third party contractors or agents who collect and use records and information on behalf of the Board, must comply with these administrative operational procedures and any related statutory requirements.
- The Board Privacy and Risk Advisor has the overall responsibility for the Records and Information Management program.
- The principal/supervisor is responsible for overseeing records management and destruction and may appoint a designate for this process.

Adopted Date:	March 31, 1998
Revision History:	May 24, 2011 February 27, 2018 December 20, 2022

Appendix A: Records Disposition Authorization Form for the Destruction/Transfer to Storage/Archival Storage of Records

1. Complete the Records Disposition Authorization Form 2. Email or courier a paper copy of Appendix A to the Catholic Education Centre, Coordinator of Information Management/ Privacy and Freedom of Information 3. Retain completed form permanently.

Employee Name: _____ School Name: _____
 Department: _____ Email Address: _____
 Phone Number: _____ Date: _____
 Destruction Authorized By: _____ Signature of Authorizing Principal,
 (Principal, Manager or Supervisory Officer) _____ Manager or Supervisory Officer: _____

Record Series/File Title <i>(Do not include personal information)</i>	Records Year Range	Retention Period	# of Boxes or Files	Request Type	Manner of Disposal	Destruction Date
				Destruction Storage Archives	Shredding Electronic Deletion	
				Destruction Storage Archives	Shredding Electronic Deletion	
				Destruction Storage Archives	Shredding Electronic Deletion	
				Destruction Storage Archives	Shredding Electronic	
				Destruction Storage Archives	Shredding Electronic Deletion	
TOTAL NUMBER OF BOXES OR FILES					Page ____ of ____	

Authorization and Signature of Coordinator of Information Management/Privacy and Freedom of Information

_____ **Date:** _____