

RECORDS MANAGEMENT

Background

The Division believes guidelines are required for the administration of records, other than those records considered Student Records, for the Division.

Definitions

Digital Storage Device refers to a piece of equipment that stores or records electronic data.

Electronic Records refers to information created, recorded, stored on any digital storage device in any format.

Employee refers to a person who performs a service for the Division as a staff member, appointee, student, volunteer, or under a contract or agency relationship with the Division.

Personal Information refers to that as defined under the Freedom of Information and Protection of Privacy (FOIP) Act.

Records refers to any type of recorded information created or collected by any Division employee in schools, administrative departments or the Board, in both paper and electronic formats, whether in draft or final form. All records, acquired or generated by an employee of the Division, are considered the property of the Division.

Student Record refers to a record or collection of records as defined in Administrative Procedure (AP) 320 "Student Records".

Accountability

The Division will manage records, as per this procedure, throughout the record's life cycle.

The Division's FOIP Coordinator or designate shall be responsible for administration of this procedure and management of Division records.

School Administrator(s) shall be responsible for:

- implementing and maintaining a records management process that meets the requirements of this procedure and is consistent with the directives established by the Division;
- assigning responsibility for maintenance of records;
- taking reasonable precautions to protect *Records* within their area of authority; and
- ensuring that staff under their supervision are kept informed of their responsibilities under this procedure.

Employees are responsible for the accuracy and safekeeping of *Division Records* under their care and/or in their possession and for the confidentiality of *Personal Information* in accordance with Division procedure and applicable legislation.

Procedures

1. Creation/Collection, Use & Maintenance

- 1.1 All *Records* created, received and/or collected by an *Employee* on behalf of the Division are subject to the guidelines of this procedure.
- 1.2 *Division Records* shall be maintained in accordance with Appendix A (*Records Retention, Disposition and Filing Guidelines*).
- 1.3 *Employees* who retrieve *Records* from a filing or storage location must safeguard them from inappropriate access and return the files to their proper locations as soon as they have served current use.
- 1.4 *Personal Information* included in *Division Records* are to be used only by those *Employees* and designated external parties who need the information in order to carry out their assigned duties.

2. Access/Disclosure

The right of access is the cornerstone of openness and accountability. Wherever possible, requests for information should be accommodated outside of the *FOIP Act*, but in keeping with the access and privacy provisions of the *FOIP Act*.

- 2.1 *Personal Information* is not to be disclosed to any third party without the consent of the individual the information is about, or as provided for in legislation.
- 2.2 The Division shall allow individuals the right to examine and receive a copy of their own *Personal Information*.
- 2.3 Where terms of a collective agreement cover access by an *Employee* to the *Employee's* personal *Records*, access to the *Records* shall be in accordance with the collective agreement;
- 2.4 Where there is no provision in a collective agreement, all *Employees* shall have access to their personal *Records* in accordance with Division procedures.
- 2.5 Any disclosure of *Personal Information* must be in compliance with the privacy provisions of the *FOIP Act*.
- 2.6 Access to a *Student Record* shall be in accordance with AP 320.
- 2.7 A request for information under the *FOIP Act* must be made in writing and sent to the attention of the Division's FOIP Coordinator.

3. Retention/Disposition

- 3.1 *Division Records* shall be retained and disposed of in accordance with this procedure and Appendix A (*Records Retention, Disposition and Filing Guidelines*).
- 3.2 The *Records Retention, Disposition and Filing Guidelines* shall document:
 - 3.2.1. the description of the *Records* under the control of the Division;
 - 3.2.2. the specifications for how long the Division must keep the *Records*;
 - 3.2.3. how the *Record* is disposed of when the retention period has passed.
- 3.3 The closure for *Records* under the Division's control shall be the Division's fiscal year end.

- 3.4 All paper *Records* that are to be disposed of must be destroyed by shredding under controlled and confidential conditions.
- 3.5 *Transitory Records* are to be disposed of appropriately when their useful life has passed.

4. Archives

- 4.1 The Division will identify permanent *Records* and ensure that they are protected while in operational use and are transferred to an approved archival facility when feasible.

5. Electronic Records

- 5.1 All *Electronic Records* must be backed up to ensure that they are protected from accidental or deliberate loss.
- 5.2 It is the responsibility of the Technology Department to ensure that an effective back-up process is implemented and working properly. This process will be reviewed annually with the Superintendency.
- 5.4 All *Electronic Records* that must be retained must be stored in a manner that will ensure security, long-term availability, minimal deterioration, and availability during the prescribed retention period.
- 5.5 When *Electronic Records* have exceeded the prescribed retention period, the data must be rendered unreadable.
- 5.4 Prior to the disposal or reuse of any *Digital Storage Device*, all *Electronic Records* must be rendered unreadable.
- 5.5 Routine administrative documents, email messages and voice mail messages considered transitory may be deleted when it has been determined that the information is no longer required.
- 5.6 If an email/voice mail is determined to be of enduring value, the information shall be retained in an appropriate manner and in accordance with this procedure.

6. Loss of a Record

- 6.1 In the event of a loss of a *Record* follow AP 141 "Technology Information Security" - *Loss of Personal Information*.

Reference: School Act
Student Record Regulation 225/2006 with amendments up to and including Alberta Reg. 170/2012
Freedom of Information and Protection of Privacy Act
Freedom of Information and Protection of Privacy Regulation 186/2008
With amendments up to and including Alberta Regulation 89/2013

Related APs: 141 Technology Information Security
320 Student Records

Appendix: Appendix A - Records Retention, Disposition and Filing Guidelines

Amended: September 2016