

Policy Title	Records Management		
Date of Issue	January 19, 1999	Related Procedure	AP 2120-D; AP 2121-D
Revision Dates	September 17, 2002; May 16, 2006; February 21, 2012 (rev. Rationale-Strategic Plan); October 18, 2022	Related Forms	
Review Date	October 1, 2027	Originator	Board of Trustees
References			
Education Act; PIM Toolkit 'Model of a Records and Information Management Policy'(pimedu.org) ; Municipal Freedom of Information and Protection of Privacy Act (MFIPPA); BP 1408-D "Privacy and Information Management"; Combined Ministry of Education Ontario Student Record Guidelines, 2000 and Bluewater District School Board AP 6701-D "Ontario Student Record"; Personal Information Protection and Electronic Documents Act (PIPEDA); Guidelines and Standards of Practice of the College of Psychologists of Ontario, College of Audiologists and Speech-Language Pathologists of Ontario, College of Nurses of Ontario, Ontario College of Social Workers and Social Service Workers, College of Registered Psychotherapists of Ontario			

1.0 RATIONALE

- 1.1 Bluewater District School Board (BWDSB) policies will support and provide direction necessary to achieve the board's Vision, Mission, and Strategic Plan priorities.
- 1.2 Bluewater District School Board is committed to the effective, efficient, and secure management of recorded information, regardless of format or media.
- 1.3 Board records are vital to the organization. They are the corporate memory of the board. The records created by an employee:
 - 1.3.1 do not belong to the employee;
 - 1.3.2 are the property of the board;
 - 1.3.3 are a corporate asset;
 - 1.3.4 are important sources of administrative, fiscal, legal, evidential, and historical information; and
 - 1.3.5 records must be accessible and available for current and future needs.
- 1.4 Bluewater District School Board operates under the authority of the Education Act and its associated regulations. The creation and management of records shall therefore be in accordance with the provisions of the Education Act, the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), and other relevant legislation and regulations of Ontario and Canada.

2.0 DEFINITIONS

- 2.1 **Classification and Retention Schedule**
The BWDSB Classification and Retention Schedule (retention schedule) provides a record-keeping plan for the board and dictates how to records found within the system.

The retention schedule gives direction to the life cycle of the record and considers any legal or statutory regulations concerning the retention of types of records. The length of retention listed in the retention schedule should be strictly followed.

The retention schedule does not apply to copies of original records.

The retention schedule is an internal document that can be accessed by employees through SharePoint.

2.2 Legal Hold

A legal hold is the retention of records beyond their normal retention because of litigation, freedom of information, or other legal requirements. Legal holds are placed on records in consultation with the freedom of information and privacy coordinator. After the legal hold is removed, the records revert to their normal retention schedule.

2.3 Legislated

Legislated records have retention periods that are determined by legislation, such as minutes of legislated committees, financial statements, Ontario Student Records (OSR), employee records etc.

2.4 Non-Legislated

Non-legislated records have retention periods that are determined by the board, such as donations, job descriptions, property damage, student enrolment, facility bookings, and student accommodation planning, etc.

2.5 Non-Record

A non-record has no bearing on the organization's functions, operations, or mandate. Non-records are typically used, if ever, only for a very limited period. They do not have to be collected and maintained. These documents are not required to be retained and therefore do not appear on a records retention schedule. Examples of non-records include the following:

- reference books;
- published legislation from other boards, municipalities, or government agencies;
- extra copies / convenience copies.

2.6 Original Clinical Record

An original clinical record is any information (assessments and clinician notes) contained in the student file prepared by the regulated health professional that meet the requirements as set out by applicable regulatory colleges. Please refer to AP 2121-D "Retention and Disposal of Clinical Records" for additional information.

2.7 Record

A record is any information however recorded whether in print form, on film, by electronic means, or otherwise. Records can be in many formats: paper, video, audio, microfilm, or electronic.

Examples of records include the following:

- email;
- text message;
- digital media;
- websites;
- electronic document management systems.

2.8 Records and Information Management (RIM) Program

When used in coordination, this policy, its related procedures, and the Classification and Retention Schedule, form the Bluewater District School Board Records and Information Management (RIM) Program.

2.9 Transitory Record

A transitory record is useful for only a short time and has minor importance. When its use is over it should be deleted or destroyed. Examples of transitory records include the following:

- personal messages;
- general notices and announcements;
- copies of documents and emails;
- cc, bcc, or for your information (FYI) emails kept only for convenience;
- drafts and working documents to prepare final records with a few exceptions such as agreements / contracts, drafts in developing legislation.

3.0 POLICY

3.1 Bluewater District School Board is committed to instituting and maintaining this policy, related procedures, and the retention schedule, which together form 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 will facilitate:

- 3.1.1 timely, relevant, and accurate management of information to support the provision of programs and services that best met the needs of our students and employees;
- 3.1.2 informed decision-making and policy development, along with effective, efficient, and trustworthy program and service delivery;
- 3.1.3 transparency and accountability;
- 3.1.4 access to and privacy of information in accordance with legislation and policies;
- 3.1.5 recording and management of business decisions and transaction that preserve corporate memory; and
- 3.1.6 access to information for legal purposes.

3.2 This policy applies to:

- 3.2.1 those records and information relating to the operation and administration of the board and to employees and students individually;
- 3.2.2 all business applications and information technology systems used to create, store, and manage records and information including email, database, applications, cloud-based storage, servers/drives, and websites; and
- 3.2.3 all board staff, trustees, and third-party contractors or agents who collect or receive records and information on behalf of the board.

4.0 SYSTEM EXPECTATIONS

4.1 The management of board records and information will be guided by the following principles:

- 4.1.1 Accessibility - Records and information will be readily available and accessible to individuals authorized to access the material.

- 4.1.2 Accountability and Stewardship - Accountability for managing records and information in the custody and control of the organization is clearly defined, communicated, and monitored.
- 4.1.3 Risk Management - Risks to records and information are managed, and practices and processes are in place to protect records and information.
- 4.1.4 Usability and Quality Control - Records and information meet the needs of staff and stakeholders. Information is timely, accurate, reliable, relevant, easy to use, and has integrity.
- 4.1.5 Planning and Coordination - Coordinated planning for records and information management is linked to organizational goals, objectives, and financial planning.
- 4.1.6 Integration - The management of records and information is integrated with program planning and other business processes.
- 4.1.7 Protection - The protection of records and information shall be in accordance with the relevant legislation. Records and information that are classified as private, confidential, privileged, secret (as referenced in the Education Act s.266(10)) or essential to business continuity shall be protected with a reasonable level of security measures.
- 4.2 All board employees, trustees, and third-party contractors or agents who collect or receive records and information on behalf of the board are responsible for creating and maintaining accurate records in accordance with the board's RIM program.
- 4.3 All records and information created, received, and maintained in the day-to-day business operations of the board within BWDSB departments and schools support the operations of the board, and as such are the property of the board and subject to this policy regardless of the medium in which those records are stored and maintained.
 - 4.3.1 Original clinical records, as prepared by regulated health professionals who are employed by BWDSB, shall be retained in accordance with the requirements of all applicable regulatory colleges, and the board's RIM Program, as appropriate. The original clinical records shall remain the property of the board (see AP 2121-D).