

# Records and Information Management Procedures Manual 316-A



**Category:** Administration  
**Administered by:** Director of Education  
**First Adopted:** Jan 2011  
**Revision History:** June 2015, June 2020  
**Next Review:** As required / 2024-25 school year

## 1. General

- 1.1 The Upper Grand District School Board (UGDSB) maintains a comprehensive Records and Information Management (RIM) program. Such a program fosters informed decision making, facilitates accountability, transparency and collaboration, and supports appropriate disclosure of information. Personal information, including personal health information, is managed in accordance with the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA), the *Personal Health Information Protection Act* (PHIPA), all other applicable legislation including any college regulations, and board policies, particularly Policy 315 Privacy Protection and Information Access.
- 1.2 It is critical to plan and protect records and record management information systems from the risk of disaster to ensure the continuity of business operations in the event of any disruption. The term “disaster” refers to a wide range of major and minor disruptions to records, records management and recordkeeping systems.
- 1.3 All recorded information created, produced, collected, received or distributed in the course of conducting board business is the sole property of the board.
- 1.4 All employees and trustees are records and information stewards and are tasked with accurately maintaining all records and information as required in a retrievable format, for current and future access.
  - 1.4.1 Employees who leave the employment of the board and trustees at the end of their term, will ensure that their files and records are transferred to their supervisor/manager, principal/superintendent or

the Secretary-Treasurer of the Board for operational continuity and retention requirements.

- 1.5 Records and information will be securely maintained for as long as required according to the records retention schedules in the Records Management Manual. The Records Management Manual will be reviewed and revised, as required, based on changes to legislative or operational needs.
- 1.6 Records and information management resources, or links to them, are provided to staff, and available on UGshare, with updates being made regularly. Such resources include those that assist in the management of the Ontario Student Record (OSR).

## 2. Definitions

**Electronic Records** are records that are captured, generated with and/or used by information technology devices. This includes digital images.

**Legal Hold** is a process that an organization uses to preserve all forms of relevant and potentially relevant information when litigation, a government investigation, investigation, audit, FOI request, or other legal issue or dispute is reasonably anticipated or is underway. During legal hold, applicable retention periods under the UGDSB's records retention schedule in the Records Management Manual are suspended and all available (including official and transitory) records must be preserved. A variation on extending the retention period for a valid reason not legal in nature is a **record hold**.

**Official Record** means any record of information created, collected and/or received in the course of regular board business that provides evidence of business decisions, actions, and transactions, including the delivery of programs.

**Record** as defined by the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA): "any record of information however recorded, whether in printed form, on film, by electronic means or otherwise, and includes:

a) 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, and

b) subject to the regulations, any record that is capable of being

produced from a machine readable record under the control of an institution by means of computer hardware and software or any other information storage equipment and technical expertise normally used by the institution.”

A record can be created on a board issued device or your personal device. If it relates to board business, it is a record of the board and is to be maintained in accordance with the board’s records retention schedule in the Records Management Manual. In addition, the record can be requested in a Freedom of Information Request.

**Records and Information Management (RIM)** is the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records throughout its lifecycle including the processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records.

**Records Retention Schedule (RRS)** is a comprehensive list of records series titles, indicating for each record series, the length of time each document or record will be retained, the responsible site (school and/or administrative department), and the legislation cited for compliance and/or value of the record when retained for operational reasons. The UGDSB’s records retention schedule is included in the [Records Management Manual](#). Simplified retention charts may be created for specific users such as the [Retention Chart for Schools](#).

### 3. Scope

- 3.1 School boards are mandated to have a records retention schedule, based on board needs and compliance requirements.
- 3.2 Systematic records management is fundamental to organizational efficiency. It ensures that the information is:
  - collected, maintained, and available for current and future access or retrieval, properly stored and retained, and destroyed on time or preserved according to need
  - utilized to meet current and future needs, and to support change
  - accessible to authorized persons only
- 3.3 The board will manage records in its custody or within its control, in accordance with statutory and organizational requirements, in order to

maintain an authentic and reliable record of its actions, transactions, and decisions.

- 3.4 Statutory obligations throughout the life cycle of the records require that records are:
- retained according to the records retention schedule with the exception of any hold on records, including a designated legal hold
  - accessible, and available, as appropriate
  - disclosed, where not exempt according to MFIPPA
  - preserved and not intentionally deleted when required as evidence or for pending or future litigation
- 3.5 Records can be in many formats, including: paper, video, audio, microfilm, and electronic (includes email, digital media, websites, electronic document management systems, etc.).
- 3.6 Electronic records stored in digital repositories (e.g. network drives, cloud storage, electronic document management systems) are to be retained in a readable format for the length of their required retention, as per the records retention schedule in the Records Management Manual.
- 3.7 Business continuity planning and contingency measures ensure that records vital to the continued functioning of the UGDSB are identified as part of risk analysis, protected and recoverable when needed.

## 4. Responsibilities

- 4.1 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 procedures, the associated operational procedures, and statutory requirements.
- 4.1.1 All records and information are managed following best practices of recordkeeping and retained according to the board's records retention schedule.
- 4.1.2 At the end of employment, term or contract with the board, records and information remain property of the board and must be returned

to the control of the board.

- 4.1.3 Privacy, access, and security measures are required to protect the confidentiality and sensitivity of all records, as appropriate.
- 4.2 Schools are responsible for the management of records created and/or used at the school, including but not limited to office records, student records, and teaching resources. Each school must have a secure storage area for managing paper records until the retention period has expired and destruction has been arranged.
- 4.3 The Records Management Officer will oversee the program and maintain a current records retention schedule.
- 4.4 Each department is responsible to advise the Records Management Officer of changes to the retention schedule to align with current legislation or operational needs.