

The Records and Information Management Program provides systematic control over the quality and quantity of information produced by the Division, from records creation until disposition. The Division ensures records are authentic and reliable, and manages information to support decision-making while protecting personal information.

Definitions

Personal Information means information about an identifiable individual including name, home address, telephone number, race, national or ethnic origin, colour, religion, political beliefs, associations, age, sex, marital status, family status, identifying numbers, fingerprints, blood type, health and health care history.

Record means information in any recorded form. This includes documents, emails, photographs, letters, handwritten notes, completed forms, meeting minutes, agendas, policies, computer data files, drawings, photographs, student records, school calendars, and any other information that is written, photographed, recorded or stored in any manner.

Records and Information Management Program (Program) defines the practices, procedures and standards for collecting, classifying, storing, securing, retrieval, access, retention and disposal of all Division records throughout the life cycle of the information. Administrative Procedures specify how records are consistently managed.

Records Retention Schedule is a timetable that identifies the records of the Division, the action that triggers the closure of the record, the length of time a record is retained before disposition and the final disposition of records (archives or destroy).

Procedures

1. The Superintendent or designate shall establish a Records Management Program which governs the management of Division Records through their life cycle.
 - 1.1. Manage all records as a Division resource to support effective decision making, to meet operational requirements and to protect the legal, fiscal, and historical needs of the division;
 - 1.2. Make optimum use of records within the Division by ensuring that it is organized to facilitate the sharing of and access to information by those who require it, subject to legal and policy constraints;
 - 1.3. Identify and conserve information that serves to reconstruct the evolution of policy and program decisions or have other enduring value;
 - 1.4. Develop and manage a consistent process to rectify any breaches or suspected breaches of the Division's legislative requirements for records.
2. All staff shall be responsible for:
 - 2.1. Managing and accessing records that are required for their jobs.

- 2.2. Documenting, creating and organizing records in the course of their work in a way that is objective and professional.
 - 2.3. Following the Division administrative procedure and respecting the principles of access to information and protection of personal privacy in an open accountability organization.
 - 2.4. Protecting all information while in their custody and control, ensuring the risk of unauthorized disclosure of personal or other confidential information is minimized.
 - 2.5. Making sure they have authority to collect personal information they request.
 - 2.6. Ensuring personal information is used in a way that is consistent with the original purpose of collection.
 - 2.7. Sharing personal information only with individuals or organizations that have the right of access or the consent of the individual about whom the information applies.
 - 2.8. Exercising their judgement in refusing to confirm the existence or nonexistence of a record if it is believed that an applicants knowledge that a record exists or not may pose a danger to an individual or would be an unreasonable invasion of their privacy.
 - 2.9. Assisting individuals in accessing information in accordance with Division procedures.
 - 2.10. Taking reasonable steps to verify accuracy of information used to make decisions affecting individuals.
 - 2.11. Reporting suspected loss of records, risk of breach under legislation or inappropriate access to the Superintendent or designate.
3. Technology Department
 - 3.1. Ensure the Division regularly backs up electronic records stored in Division managed servers and follows best practices in data disaster recovery.
 - 3.2. Ensure the Division follows best practices to prevent unauthorized access to the records stored on the Division's network and Division managed servers.
 - 3.3. Maintain an identity database, such as Active Directory, for staff and students in order to control access to the Division's electronic records.

Records Management Program (Program)

1. All records, regardless of their format or location, are the sole property of the Division and managed under the Program approved by this Procedure.
2. The record's life cycle encompasses the creation, receipt, use, maintenance, storage and final disposition of all records. The Program ensures the proper custody, storage, access,

retention and disposition of records in accordance with applicable legislation and industry best practices.

3. Records are generated in the course of daily activity and managed to ensure their confidentiality, integrity and availability.
4. Under this Program, records are:
 - 4.1. Classified according to a consistent methodology which identifies value of and risks to each type of record.
 - 4.2. Stored in a repository and format consistent with each identified record classification.
 - 4.3. Managed through a life cycle defined by retention schedule tagged to the classification of each record.
 - 4.4. Protected from disaster to an appropriately identified degree through disaster prevention and recovery planning.
 - 4.5. Vital records necessary for maintaining the ability of the Division to function and continue its mandate must be identified and afforded the highest level of protection.
 - 4.6. Disposed of according to the retention schedule associated with the classification of each record.

Classification and Retention of Records

1. Record classifications are outlined and tracked in the Records Retention Schedule (Appendix B). The Schedule will be regularly reviewed and updated.
2. Each school and department is responsible for managing their records according to the appropriate retention schedule.
3. Specific details regarding the management of Student Records are identified in Administrative Procedure 314 – Student Records.
 - 3.1. Any record in the PASI (Provincial Approach to Student Information) system that is part of a legal matter will be pulled and held as a transitory document until the legal matter is resolved.

Records Conversion, Storage, and Recovery

1. Document digitization projects are subject to quality assurance processes, established and implemented by the schools and/or departments who manage those documents.
2. Staff shall accept from parents and other external parties digital copies of documents, provided they are legible and that they have reason to believe that the source is legitimate;
 - 2.1. through the evidence inherent in the exchange medium (e.g. audit trail or secured account), or

- 2.2. through an agreement which sets a general understanding that is the expected method of document exchange between those two parties.
3. Storage of physical records is expected to be under a level of security commensurate with expectations outlined in the Records Retention Schedule.
4. Electronic records are expected to be retained within an electronic repository which has been reviewed and approved by the Superintendent.
 - 4.1. Appropriate disaster prevention and record recovery measures are in place according to the Records Retention Classification.
 - 4.2. Identified Vital Records shall be managed and secured to ensure the continuity of mandates in the event of disaster.
 - 4.3. Security controls and audit capabilities should be put into place according to the Records Retention Classification.

Disposition of Records

1. Once records have met their life cycle requirements, the destruction of records is subject to approval by the Records Officer based on submitted inventories and procedures. Measures and in place for the secure destruction of all records.
2. Records identified as “archival material with historical meaning’ under this Records Management Program are not to be disposed of and are to either be displayed or stored in an appropriate location.

The following resources may be applicable to the Administrative Procedure:

- 1) Appendix 135 – A Records Retention and Disposition Schedule

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Reference: *Education Act*, SA 2012, c E-0.3, ss.33, 52, 53, 68, 197, 222, 225
Freedom of Information and Protection of Privacy Act, RSA 2000, c F-25
STAR Catholic Administrative Procedure 185
Elk Island Catholic Administrative Procedure 185