



YORK CATHOLIC DISTRICT SCHOOL BOARD

PROCEDURE: Records and Information Management

Addendum to Policy 109: Records and Information Management

Effective: June 21, 2023
Revised: June 20, 2023

1. PREAMBLE

The Records and Information Management Procedure (“the Procedure”) supports the implementation of Policy 109 Records and Information Management Policy and the York Catholic District School Board is committed to implementing and maintaining a comprehensive Records and Information Management (RIM) Program for the systematic creation of records and information that are accurate, authentic, reliable, trustworthy, secure, efficient and effectively support accountability while serving as evidence and preserving Board activities for as long as required for present and future generations. This RIM procedure is to outline the following:

- 1.1 The RIM program complies with the obligation to maintain records and information in keeping with relevant legislation through the application of a systematic classification and retention scheme for the creation, identification, arrangement, retrieval, security, storage, retention, and disposition or archive of records and information.
- 1.2 Records and information created, produced, collected, received, and distributed, during the course of Board business, administrative department, and school support day to day operations are considered to be Board information and strategic assets in custody and / or control of the Board.
 - 1.2.1 This procedure applies directly to the following policies and procedures:
 - YCDSB Records and Information Management Policy
 - YCDSB Privacy and Freedom of Information Policy
 - YCDSB Privacy Breach Procedure, Freedom of Information Request
 - YCDSB Records Retention and Disposition Procedures
 - YCDSB Records Classification, Retention, Security and Disposition Schedule
 - YCDSB Code of Conduct
- 1.3 The records and information management policy and procedures ensure that the appropriate attention/ protection is given to all YCDSB records and increases the efficiency of document/ file retrieval. The procedures ensure responsible management of board records and record-keeping systems as valuable resources, assets, and board compliance.
- 1.4 All board/school records created, received, and/or maintained by YCDSB’s affiliated staff and those acting as agents, in the course of their duties on behalf of YCDSB, regardless of physical form or characteristic (including paper, electronic, audiovisual, microform), are considered YCDSB’s property and subject to its control(s), including this procedure.

2. RIM PRINCIPLES

- 2.1 The records management procedures ensure board/school records are effectively managed throughout their creation, maintenance, and final disposition by:
 - Ensuring accountability information structures are in place for the management of board/school records.
 - Identifying documents into non-business, transitory and board records to apply retention on board/school records that must be retained for an approved set period of time.
 - Recording processes and the adequacy of records systems are transparent throughout processes.
 - Ensuring procedures are standardized across all departments.
 - Implementing a central records management inventory system to ensure board/school records can be located and retrieved effectively and efficiently in order to minimize board maintenance costs.

- Exploring opportunities for integration with the records/document management system are recognized.
- Ensuring all records systems have integrity and are reliable, compliant, comprehensive and systematic.
- Supporting accountability, audits, and promoting efficiency in order to minimize corporate risks.
- Complying with all applicable legal and audit requirements.
- Ensuring records are easily located and accessible based on security permissions
- Preserving archival significance
- Ensuring proper and timely disposition to mitigate risk and liabilities
- Promoting accountability and efficiency in order to save time and costs

3. LEGISLATION

3.1 *The Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)* provides individuals with a right of access to certain records and personal information under the custody or control of institutions covered by the Act. The purposes of the Act are as follows:

- To provide a right of access to information under the control of institutions in accordance with the principles that,
- To ensure information should be available to the public,
- To ensure necessary exemptions from the right of access should be limited and specific,
- To ensure decisions on the disclosure of information should be reviewed independently of the institution controlling the information; and
- To protect the privacy of individuals with respect to personal information about themselves held by institutions and to provide individuals with a right of access to that information.

The Municipal Freedom of Information and Protection of Privacy Act is divided into four parts:

Part I: Freedom of Information deals with the right of access to records, the exemptions to that right, and access procedures (Sections 4-26).

Part II: Protection of Individual Privacy concerns the collection, use and disclosure of personal information. This part also deals with an individual's right of access to his or her own personal information and the right to request correction of that information (Sections 27-38).

Part III: Appeal deals with the right to appeal and the procedure involved in appealing a decision made by an institution (Sections 39-44).

Part IV: General covers on general matters including the charging of fees, offences, regulations and the powers and duties of the Information and Privacy Commissioner (Sections 45-55).

The Act applies to any record in the custody or under the control of an institution. This includes records that were created both before and after the Act [Subsection 52(1)]. An Institution is the general term for local organizations, boards and other bodies covered by the Act. An institution is responsible for administering and adhering to the requirements of the Act.

The Act does not impose any limitation on the information otherwise available by law to a party for litigation. Where an institution is required to produce documentary evidence pursuant to rules of court, the exemptions in the Act does not affect the power of a court or tribunal to compel a witness to testify or compel a production of a document [Subsection 51(2)].

3.2 *The Personal Health and Information Protection Act (PHIPA)* sets how to manage personal health information records for students and employees of the Board.

3.3 *Education Act* sets out provisions for district school boards to establish Records and Information Programs to establish schedules for the classification, retention, disposition and eventual destruction or archive of records of the board and the schools under its jurisdictions other than records retained for archival use.

This procedure is consistent with subsection 171, (1), par.38 of the Education Act which states the Board may institute a records and information management program.

3.4 *The Ontario Evidence Act and The Canada Evidence Act* addresses how the Board's Records and Information Management may be used as evidence in legal court proceedings.

3.5 Other Sources of Legislation For some records, the law will specify a limitation, which is a time frame of risk during which the organization may sue or be sued. Other considerations when determining the retention period of a record are operational needs, costs, benefits and risks involved in keeping a record. Should any of these sources change, the RIM Program Manual will be revised to reflect the necessary revisions. Questions and/or concerns should be communicated to the Director's Office.

4. RIM Program Scope and Requirements

4.1 The YCDSB's Records and Information Management Program shall:

- Define practices for the effective control over Board records and information providing for the security and confidentiality of all records and information stored.
- Define all records and types of information to be stored.
- Define processes for a record-keeping system that will effectively maintain, store and allow for the safe retrieval of records and information.
- Define a records and information management retention schedule that sets out, for each classification of records created or received, the length of time the records will be retained.
- Define processes for the secure disposal of records and information when administrative, legal and fiscal values have ceased and all legal requirements as they affect Board documents have been met or have become inactive as defined in the retention schedule.
- Define processes for the identification and preservation of records and information of enduring value due to archival, historical or other vital reason(s).
- Be updated in conjunction with any review of the Records and Information Management Policy.
- Be available to all Board employees through the Board's website.

5. Roles and Responsibilities

In order to effectively manage the Records Management Program, it is important to provide a clear definition and understanding of each role, function, and responsibilities in the workplace.

The Senior leadership team for all areas of the business are responsible for ensuring the success of the YCDSB Records Management Program within their respective areas of responsibility by:

- Supporting the implementation of the program.
- Allocating resources to effectively manage board records.
- Promoting and ensuring compliance.
- Making provisions for regular audits.

5.1 Director of Education

- To oversee compliance with the Records and Information Management Policy, Procedures, and Program.
- To provide the administrative procedures necessary to implement this policy.

5.2 Superintendents, Administrators, Senior Managers and Managers

- To assume responsibility for the information and records they create and maintain.
- To oversee compliance within their departments of the Records and Information Policy and the requirements outlined in the Records and Information Management Program.
- To assign and document accountability of records management within the department.
- To classify their board records according to the YCDSB Records Retention and Disposition schedules
- To ensure all their board records are included in the YCDSB Records Retention and Disposition Schedules, and the schedules are followed.
- To consult with, Records Management Manager/Officer, regarding best practices for achieving accountability, access, and development of records procedures to manage board records throughout its life-cycle (“creation, maintenance, final disposition”).
- To ensure their staff create, maintain and dispose of board records in accordance with established records management policies and procedures
- To provide the necessary resources to manage board records
- To develop a Records Information Resource Centre with a Records Coordinator to manage the standards of the Records Management Program and liaise with the Records Management Manager/Officer to ensure compliance of the operations.
- To hold the destruction of records when the board/school records are related to a legal claim or a regulatory inquiry which is ongoing or is anticipated.

5.3 Senior Leadership Department Heads at Board or School Administrator(s)

- To oversee Records and Information Management
- To ensure the schedule for classification, retention, disposition, archive and routine evaluations of adherence to the policy for RIM Program activities and routine audits to ensure productivity of the program.
- To provide training to all staff who are responsible for Records Information and Management processes and as it relates to the requirements outlined in the Records and Information Management Program Manual.

5.4 Staff

- To comply with the Records and Information Management Policy and the requirements outlined in the Records and Information Management Program.

For the current operations of the departments who do not have a Records Management contact, the administrative staff will be the point-of-contact for managing files for their respective groups.

Key Responsibilities:

- To maintain the collection of information sources with an index and retrieval system approved by Records and Information Management
- To file documents into the approved file system to support the department process
- To implement a charge-out system to prevent lost departmental records
- To catalogue and track file folders and similar materials
- To only use paper copies when needed and eliminate paper duplicates
- To respond to record requests

- To track all file folders, storage boxes, and similar materials stored at the offsite record center
- To schedule, track and manage the commercial storage of board records
- To use appropriate file supplies and equipment
- To transfer to inactive storage or archives when those files are no longer needed in the office.
- To conduct an annual purge of board records

All staff are responsible for:

- Creating board records in a timely and accurate manner to document all decisions and actions taken for which they are responsible.
- Maintaining board records so that accurate and complete information can be found when needed. This means setting up and maintaining directory files and filing materials (in all formats) in accordance with this records management procedures.
- All Departmental Records are classified to the records series as set out in the YCDSB Classification and Retention Schedule (Appendix A). If a YCDSB record is not listed in a record series, the department must contact the Privacy, Records, Information, and Archive Management Services who will provide guidance (and/or create a new Records Series where applicable).
- Carrying out the disposition of board records under their control in accordance with the Records Retention and Disposition Schedules.

5.5 Privacy, Records, Information, and Archive Management Services

Board-wide responsibility for the records management program by:

- Providing central direction for the YCDSB Records and Information Management Program, including the development of board records management policies, standards, procedures and guidelines. Their identification, description, storage, transfer and preservation or disposal.
- Every department and sub-departments (collectively “Departments”) must develop and implement comprehensive, written operations procedures for Records and Information Management that:
 - Specify who is accountable for each aspect of Records and Information Management within their Departments; and
 - Ensure compliance with the RIM Policy and all reference documents listed
- Monitoring, research, and management of the Records Retention and Disposition Schedule.
- Developing effective techniques for management of board records in conjunction with Departments including the administration of the board records / document management system.
- Developing and promoting, in collaboration with the Information Services Division and Departments, a framework for the management of electronic information, which includes standards, guidelines, tools, and best practices that support this procedure.
- Providing records management advice, training and assistance to Departments.
- Assisting Departments to integrate records management requirements into business strategies and plans.
- Developing business continuity planning for identifying and protecting board records deemed vital for continuity of mission-critical business operations.
- Coordinating dispositions and destruction approvals.
- Working with the Regional Internal Audit Team to develop monitoring procedures to ensure compliance to policy and practice.

- Safeguard from improper disclosure, use, disposition or destruction, in accordance with legal, privacy (applicable privacy legislation and YCDSB's Privacy Policy and Guidelines), and policy obligations. (For board records containing personal information, refer to YCDSB Privacy Code). Safeguard vital board records and contingency management of board records.
- Install proper controls and guidelines for managing YCDSB's board records within storage at the YCDSB warehouse or school storage rooms.

5.6 Records Management Committee

To Serve in an advisory capacity and establish subcommittees to evaluate special issues from time to time.

- Overall responsibility for the administration of the RIM program.
- Responsible for evaluating enhancements, initiating changes, working with Senior Management to address compliance and soliciting feedback, and ensuring that the needs of the Departments / Functioning Areas are being met on a continuous basis

5.7 Archives

To serve as the YCDSB's corporate memory by identifying, preserving and making available for use; the board's permanently valuable / historical records.

5.8 Information Technology

To develop a framework for the management of electronic information, which includes:

- standards, guidelines, tools, and best practices that support this policy and procedure,
- provides assistance in the sourcing and implementation of the board records / document management system,
- acts as the custodian (but not the owner) of electronic records – implement the appropriate controls; providing physical and procedural safeguards for electronic records / information; ensuring electronic records / information are accessible and readable during their life-cycle; and assisting the Departments / Functional Area's in evaluating the cost-effectiveness of controls,
- developing test and implement a disaster recovery plan to ensure vital board records are backed up in order to facilitate access and readability in the event of a disaster,
- ensuring board records accessibility and usability over time and through technological change.

5.9 Regional Internal Audit Team (RIAT)

- To conduct audits of records management activities to ensure compliance to this policy and procedure

5.10 Office Services

- To work with the Records and Information Management Manager / Officer to provide cost-effective and secure transfer, storage and retrieval services for inactive board records within the warehouse and school storage rooms.
- To Work with the Records and Information Management Manager / Officer to provide cost-effective, secure and accurate disposal services for board records eligible for destruction in accordance with the Records Retention Schedule.

6. Definitions

Archive

An area utilized for storage of inactive records, manuscripts, papers and memorabilia which are retained permanently for the benefit of the school/board and posterity.

Classification and Retention Schedule

A schedule setting out a functional organizational structure for classifying official records and applicable retention periods developed through a review of the board information assets and departmental consultation. This identifies legal requirements, operational needs, and records management best practices.

Information Governance

A strategic asset that governs the decision and accountability framework to apply appropriate controls for the creation, valuation, use, sharing, storage, archiving, and deletion of information. This includes clearly outlining the policies, standards, processes, metrics, and roles guiding the efficient and effective use of information.

Information Lifecycle

The stages in which information passes is characterized as creation or collection, processing, dissemination, use, storage, and disposition, to include destruction and deletion.

Official Records

Recorded information in the custody and control of the board relating to the mandate and functions of the board that have been identified for the legal retention and disposition requirements. Records having the legally recognized and judicially enforceable quality of establishing some fact, policy, or institutional position or decision.

Record

Information created, received, and maintained as evidence and information by an organization or person, in pursuance of legal obligations or the transaction or decision of a business.

Records and Information Management

The field of management responsible for establishing and implementing policies, systems, and procedures to capture, create, access, distribute, use, store, secure, retrieve, and ensure disposition of an organization's records and Information.

Transitory or Non-Records

Documents that have short-term use only and do not need to be filed and have no evidence value within legal proceedings. They are produced or received in the course of actions, in preparation of other records which replace them or convenient reference.

7. YCDSB Classification and Retention Schedule

The YCDSB Records Classification System provides a framework for organizing company records of any medium into folders for access, retrieval, storage, and disposition. The standard format for classification is based on five groups: Primary Classification, Primary Name, Department, Record Type and Date. YCDSB records managed by various departments will be arranged by primary classification, primary name, secondary name, file code and date.

Classification Example to Create Files:

Primary Classification Primary Name Secondary Name File Code Date Year

Example:

Employee Smith, Jane. Employee Records H07 2022

Most YCDSB records fall into one of the Primary Classifications below based on the type to which the information is related. For example, a contract relates to a vendor and therefore falls into the Vendor Classification: Board, Employee, Student, Vendor, Property, Project.

The Primary Name is the dominant description field used to retrieve the relevant information of the file.

The following lists each of the Primary Classifications and the corresponding naming conventions to be used for the Primary Name field of the file.

Board – For internal documents, York Catholic District School Board will represent the internal document types

Naming Convention: Full Legal Name of the Company

Example: YORK CATHOLIC DISTRICT SCHOOL BOARD

Employee – Information and documents specific to an employee. This includes union matters relating to employees, group and policy grievances

Naming Convention: Employee's Last Name, First Name

Example: SMITH, JOHN

Student – Information and documents specific to a customer

Naming Convention: Student's Last Name, First Name

Example: DOE, JANE

Vendor – information and documents relating to a Loblaw Vendor or Counterparty

Naming Convention: Full legal name of the vendor or in certain cases, a recognizable portion of the name.

Example: BLACK AND DECKER

Property – Information and documents specific to property owned or leased by Loblaw. This includes Franchise and Franchisee information and documents.

Naming Convention: Province, Region, Address

Example: ON AURORA 325 BLOOMINGTON RD.

Project – Information and documents specific to a project.

Naming Convention: Full Title of Project

Example: FORMS AND WORKFLOWS VENDOR SELECTION 2023

See Appendix A – YCDSB Classification and Retention Schedule

8. Records Retention

YCDSB records must be retained:

- i. For the minimum retention periods set up in the YCDSB RIM Policy
- ii. In a manner that (i) ensure easy retrieval by other employees authorized to access such records, (ii) is secure and (iii) complies with the "Information Security Policy"
- iii. With special safeguards for Vital Records which include a contingency plan to recreate or access alternate copies of Vital Records if necessary

9. Disposition of Records

- a. Each Department must conduct (minimum) an annual review to identify YCDSB Records that are eligible for destruction because the minimum retention period has expired.
- b. When the minimum retention period has expired, each Department must dispose of, or archive the YCDSB Records in accordance with the YCDSB RIM Policy, disposition process, and

Appendix A

10. Assessments of Records and Information Management Compliance

- a. Each Department must conduct an annual review of compliance with its Records and Information Management processes, identifying and documenting risks and other significant issues, and undertaking corrective action as required.

11. REFERENCES

Legislation

[*Municipal Freedom of Information and Protection of Privacy Act*](#)

[*The Personal Health and Information Protection Act*](#)

[*Education Act*](#)

[*The Ontario Evidence Act*](#)

[*The Canadian Evidence Act*](#)

YCDSB Policies

[*Policy 104 Participation Meetings Using Electronic Means*](#)

[*Policy 108A School Archive*](#)

[*Policy 108B Central School Board Archival Collection*](#)

[*Policy 112 Privacy and Freedom of Information*](#)

[*Policy 113 Intellectual Property*](#)

[*Policy 116 Copyright*](#)

[*Policy 117 Code of Conduct*](#)

[*Policy 227 Ontario Student Record*](#)

[*Policy 317 Electronic Communications and Social Media*](#)

[*Policy 705 Use of Video Surveillance*](#)

[*Policy 609 Accessibility Standards for Information and Communication*](#)

[*Policy 809 Staff Use of External Legal Resources*](#)