

**School District #62 (Sooke)**

<b>RECORDS MANAGEMENT</b>	No.: F-329
	Effective: May 28/24 Revised: Reviewed: Apr. 9/24; Apr. 30/24; May 28/24

**ADMINISTRATIVE REGULATIONS**

**Purpose**

This regulation establishes School District #62’s (Sooke) regulations concerning records management.

**Regulation**

Records management regulations include:

- 1.1 Definition of a Record
- 1.2 Records Management Governance
- 1.3 Records Retention Schedules
- 1.4 Transitory Records
- 1.5 Records Destruction
- 1.6 Records Access, Storage, and Security
- 1.7 Remote Access and Records Transfer
- 1.8 Version Control and Naming Conventions
- 1.9 Executive Records
- 1.10 Vital Records
- 1.11 Archival Records
- 1.12 Digitization of Records
- 1.13 Managing Email
- 1.14 Legal Requests for Records
- 1.15 Office of Primary Responsibility
- 1.16 Correction to Personal Information

1.1 Definition of a Record

Records include books, documents, maps, drawings, photographs, letters, vouchers, papers, and any other thing on which information is recorded or stored by graphic, electronic, mechanical, or other means, but does not include a computer program or any other mechanism that produces records.

1.2 Records Management Governance

School District #62 (Sooke) is responsible for establishing the framework and accountabilities for records management policies, schedules, systems, standards, and guidelines in alignment with legislative and regulatory requirements, including the *Freedom of Information and Protection of Privacy Act* and the *School Act*, etc. This is to ensure the proper management of records, preserving and protecting the integral properties of records. The School District #62

(Sooke) Records Officer (if one has been formally appointed) is responsible for implementing a records management program as a best practice to ensure records within their respective portfolio are effectively managed.

All employees and third-party service providers are responsible for managing and securing the records they create, collect, amend, and receive in the context of their functional responsibilities in accordance with the requirements identified in this document.

### 1.3 Records Retention Schedules

Records will be retained, managed, and disposed of according to approved records retention schedules. Records retention schedules will prescribe timetables that govern the records lifecycle and will be required before records can be destroyed, transferred to the legal custody of another organization, or retained in perpetuity. Key subject matter expert review will be required to ensure retention periods are reflected accurately in the records retention schedules.

This regulation is accompanied by a procedure/schedule, School District #62 (Sooke) *Records Classification and Retention Schedule*.

### 1.4 Transitory Records

Transitory records may be immediately disposed of as soon as their business use ends. Transitory records are records of temporary usefulness that are needed only to complete a routine action or prepare a subsequent record (e.g., a new version). Transitory records are not needed to meet legal, policy, or financial obligations, not needed for operations, program delivery or operations, and not needed to account for SD62 actions or decisions.

This regulation is accompanied by a procedure.

### 1.5 Records Destruction

Records will be eligible for final disposition when their scheduled retention period has expired as prescribed by School District #62 (Sooke) *Records Classification and Retention Schedule*. Authorized disposal of records will be done in such a way that information cannot be retrieved or reconstructed. Destruction of records will be done securely and confidentially and, if required, with the issuance of an official "Certificate of Destruction" from third-party service providers once destruction has been completed.

This regulation is accompanied by a procedure.

### 1.6 Records Access, Storage, and Security

Records will be accessible to all authorized users to fulfill the duties of their role. Therefore, School District #62 (Sooke) will provide access to, manage, preserve, and dispose of records in compliance with records management legislative and regulatory requirements, including the *Freedom of Information and Protection of Privacy Act* and *School Act*, etc.

Records access will be assigned based on least privilege need-to-know principles meaning that employees and service providers will be given access to the minimum amount of records/data required to fulfill the duties of their position. User access will be reviewed every 6 months to ensure access is current and accurate.

Sensitive, personal, and confidential records will be stored in secure areas. All records will be managed and preserved to remain authentic, trustworthy, complete, and accessible throughout their lifecycle regardless of location, media, or format. Records will be protected from unauthorized disclosure, modification, removal, or destruction at all times.

Records that are no longer required to be stored on-site at School District #62 (Sooke) premises will be stored offsite at a secure and bonded storage facility where they will be protected against theft, water damage, fire damage, and earthquake damage. Accurate records listings will be maintained for all records stored offsite to assist with the identification and timely retrieval of records should they be required by School District #62 (Sooke). The Records Officer (if one has been formally appointed) or designate must approve all offsite records transfers and records retrievals.

When employees access and remove physical records currently being stored in semi-active storage areas at a designated workplace, they must follow a pre-defined logging system that is administered by the office of the primary responsibility for the records as determined by School District #62 (Sooke) *Records Classification and Retention Schedule*.

#### 1.7 Remote Access and Records Transfer

When working remotely School District #62 (Sooke) employees and third-party service providers will ensure the protection and security of all records. Whenever possible physical records should not be removed from the worksite. Any exceptions to this must be pre-approved by the employees'/service provider's manager or administrator. A record documenting the approval and the records involved must be kept.

School District #62 (Sooke) acknowledges the need to disclose or transfer student records to schools both within and external to the district. At all times these transfers/disclosures must be made with the strictest of security measures to ensure the records maintain their integrity and our requirements to protect privacy are not impaired. Measures to safeguard records from risks such as unauthorized collection, use, disclosure, access, and destruction are imperative in maintaining the integrity of records when offsite or in transit.

This regulation is accompanied by a procedure.

#### 1.8 Version Control and Naming Conventions

To ensure the correct version of an electronic document is being used and managed appropriately, version control and naming conventions are required and will be administered in compliance with the *Records Classification and Retention Schedule*.

This regulation is accompanied by a procedure.

#### 1.9 Executive Records

Executive records are the administrative and operational records (in all formats) of the offices of the Superintendent, Deputy Superintendent, Associate Superintendent, Secretary-Treasurer, Executive Director of Human Resources, Executive Director of Digital Solutions, and the Trustees of the Board of Education. These records often document the development, implementation, operation, and evaluation of School District #62 (Sooke) policies, programs, and services. Such records are unique primary source documents and will be retained.

A specialized retention schedule is required that governs the lifecycle of Executive records from inception to final disposition. This special Executive schedule takes precedence over all other retention periods in the *Records Classification and Retention Schedule for this class of records*.

This regulation is accompanied by a procedure.

#### 1.10 Vital Records

Vital records will be securely protected so that re-establishing the legal, financial, and functional responsibilities of School District #62 (Sooke) is achieved quickly after a catastrophic event. The identification and management of vital records is included in the Business Continuity Plan. Due to their significance, paper vital records should not be stored onsite but rather offsite storage should be used using a provincially recognized records storage service provider. In addition, a secure electronic offsite backup of these records must be kept.

This regulation is accompanied by a procedure.

#### 1.11 Archival Records

Records that meet the criteria of archival will be those that both document the activities, decisions, and responsibilities of School District #62 (Sooke) and contribute to an understanding of the history and culture of the organization. Records that meet archival requirements will be appraised by their information content and the context of their creation which should be reflected in the *Records Classification and Retention Schedule*. Archival records will provide the best evidence of the activities and responsibilities of School District #62 (Sooke), and/or have significant intrinsic value.

#### 1.12 Digitization of Records

School District #62 (Sooke) is committed to storing records in their digital format whenever possible. Digitization replaces paper records with digital copies to provide online access or provides a digitized copy destined for digital archives. The digitization of records will include planning, assessing, preparing, digitizing, compiling metadata, conducting quality assurance mechanisms, and storing and managing the digitized records.

#### 1.13 Managing Email

Email is the most common form of written communication when conducting business and often represents administrative, operational, legal, evidentiary, archival, or historical value. Email meets the formal definition of a record and is equally subject to the *Freedom of Information and Protection of Privacy Act* (FIPPA). All records present significant business risk and expense if stored beyond their retention period and must be managed in accordance with the *Records Classification and Retention Schedule*.

This regulation is accompanied by a procedure.

#### 1.14 Legal Requests for Records

Records in the custody and/or control of School District #62 (Sooke) may be subject to legal requests from time to time including document discoveries and requests made under the *Freedom of Information and Protection of Privacy Act*. Once a legal request has been received it is essential that all responsive records eligible for final disposition and destruction that have reached the final stage of their respective lifecycle (e.g., when the scheduled active and semi-

active retention periods have expired) do not proceed. All records must be held by School District #62 (Sooke) until all legal proceedings have been completed.

This regulation is accompanied by a procedure.

#### 1.15 Office of Primary Responsibility

The Office of Primary Responsibility (OPR) is the office within School District #62 (Sooke) that is responsible for the business function related to the records. The OPR retains the official records to meet operational, financial, legal, audit, and other requirements.

School District #62 (Sooke) identifies the OPR for all records in our custody and control within the *Records Classification and Retention Schedule*.

Non-OPR departments are not required to maintain the records of OPR departments which supports the reduction and elimination of duplicate copies of records throughout School District #62 (Sooke). If you are ever unsure which department is the OPR for a particular record, please review the *Records Classification and Retention Schedule* or contact the Records Officer (if one has been formally appointed).

#### 1.16 Correction to Personal Information

Under Section 29 of the *Freedom of Information and Protection of Privacy Act*, an individual whose information is in a public body's custody or control who believes there is an error or omission in their personal information can request the Head (or designate) of the public body to correct the information when the individual is unable to correct the information themselves.

School District #62 (Sooke) is therefore required to correct or annotate personal information in its custody or control when it receives notification of a correction or annotation of personal information (once identity is verified and correction request is validated). School District #62 (Sooke) is also required to correct or annotate personal information in its custody or control when it receives notification of a correction or annotation of personal information from another public body.

This regulation is accompanied by a procedure.

### **Definitions**

**Active records:** are records in constant use that need to be retained in the office close to users.

**Administrative records:** are records which are common to all organizations. They support functions such as the management of facilities, property, material, finance, personnel, and information systems, as well as committee activities, agreement development, contract management, information services, and legal matters.

**Archival records:** are records used to administer, support, or document the delivery of SD62 programs, carry out operations, make decisions or account for District activities, and require indefinite preservation.

**Full Retention:** refers to the requirement to retain records permanently once they have reached their final disposition for historical or archival purpose.

**Inactive Records:** are records that are no longer required for ongoing District business. These are records that are ready for final disposition; in other words, records for which the scheduled active and semi-active retention periods have lapsed.

**Office of Primary Responsibility:** is the business area that creates or receives and files original, official records relating to its particular function or activity within the District. The department is responsible for defining and following the retention and disposal schedule established for its records.

**Official District Records:** are all records created or received by District employees and third-party service providers in the course of their duties on behalf of the District and retained to meet business, legal, financial, legislative, and other needs. Official District records may be in the form of paper, non-paper-based media such as microfilm, audio or video tapes and electronic media such as email, Word documents, spreadsheets and presentations documents, digital images of paper or microfilm, database, web sites, portals, and social media tools.

**Operational records:** are records which are unique to SD62. They support its operations and services in carrying out the functions for which it is responsible according to statute, mandate, or policy.

**Personal Information:** means recorded information about an identifiable individual.

**Personal Information Bank:** is a collection of personal information this is organized or retrievable that may be retrieved using an individual identifier such as name, student or employee number, symbol, or another identifier assigned to an individual.

**Records schedule:** is a prescribed timetable that governs the life cycle of a file from creation, through active use within an office, retention in off-site storage during its semi-active period, to final disposition when it becomes inactive.

**Retention and disposal schedule:** defines specific time period for keeping records in the office (active phase), for maintaining records in storage (the semi-active phase), and determining their final disposition) destruction or indefinite archival preservation.

**Retention period:** the length of time a file is retained, as governed by the records schedule.

**Selective Retention:** refers to the process of determining records that should or should not be retained once they have reached their final disposition for historical or archival purpose.

**Semi-Active records:** are records no longer used constantly, but are required for reference, legal, audit or other purposes. Semi-active records may be transferred to on or off-site secured storage to free-up limited and expensive office space.

**Superseded or Obsolete:** identifies records for which retention is dependent upon the occurrence of some event or action. Superseded or obsolete is used to allow records to be retained for a flexible period, until they are no longer useful for reference or informational purposes.

**Transitory records:** are records of temporary usefulness that are needed only to complete a routine action or prepare a subsequent record (e.g., a new version). Transitory records are not

needed to meet legal, policy, or financial obligations, not needed for operations, program delivery or operations, and not needed to account for SD62 actions or decisions.

**Vital records:** are records considered essential to SD62's continuing or resuming its operations in the event of a disaster. A record is vital when it would be required to resume or continue District business, support SD62's legal or financial position or is made vital by regulation or statute.