

## RECORDS AND INFORMATION MANAGEMENT

### Background

HPSD requires a uniform process for administering records to promote integrity, efficiency and consistent accountability throughout the lifecycle of all records. Furthermore, HPSPD requires that its corporate information be managed and controlled systematically from creation to disposition in accordance with legal, regulatory and operational requirements. All HPSPD employees must adhere to proper custody, storage and disposal of records in accordance with the HPSPD's Record Retention Schedule. All records, regardless of their format (i.e. Paper, electronic, email, photo, video or audio) or location, are the sole property of HPSPD and shall be retained only when required for legislative, corporate or archival reasons or at the discretion of those administrative officers responsible for them.

### Definitions

*Corporate Records* – documents, data or information made or received and maintained by HPSPD in pursuance of its legal obligations or the transaction of its business, regardless of media (paper, tapes, audio, video, film, and electronic). All records created by an employee of the Board or an individual contracted by HPSPD are considered corporate records and the property of HPSPD.

*Destruction Notice* – form of authorization that is completed to indicate that the records listed on the form have been verified against HPSPD's Record Retention Schedule as being eligible for disposition.

*Classification Scheme* – a consistent methodology for organizing records called a classification scheme shall be developed and maintained by the Records Manager in collaboration with decision units. All staff will file significant records according to the classification scheme.

*DocuShare* – a Web-based document management system that allows users to easily store, access and share information in a secure and collaborative work environment; managed by the Records Manager.

*Electronic Document* – an electronic document is data that is recorded or stored on any medium or by a computer system or other similar device that can be read or perceived by a person or a computer system or other similar device. It includes a display, print out or other output of that data.

### *Life Cycle of a Record:*

- *Active Records* – records that are used on a frequent basis and for which the action, service, transactions, project is not complete. These records are stored on site and access to them is immediate.
- *Semi-Active Records* – records for which the action, service, transaction or project is complete and which are required to be accessible for follow up, evaluation, audit, or legal requirements during a possible dispute. These records are not immediately accessible and may be stored at a centralized HPSPD records storage facility.
- *Closed Records* – records that have met all organizational and legal requirements. Records at this stage are either destroyed or transferred to the custody and control of Archives and Museum.

*Owner* – the HPSPD employee who has the responsibility and accountability for ensuring the existence, maintenance and security of the master record. All records have an identifiable owner acting on behalf of HPSPD. The owner of permanent records shall be the Records Manager.

*Record* – a record of information in any form and includes notes, images, audiovisual recordings, x-rays, books, documents, maps, drawings, photographs, letters, vouchers and papers and any other information that is written, photographed, recorded or stored in any manner, but does not include software or any mechanism that produces records. These records are subject to the Freedom of Information and Protection of Privacy Act.

*Significant Records – regardless of physical form, created or received by the Board or an agent of the Board, are those which document:*

- *results of significant daily activities that support the mission and objectives of HPSD;*
- *advice and recommendations made to management and the decisions and the rationale for those decisions and actions taken or not taken as a result, along with supporting documentation;*
- *problems encountered in business operations and the steps taken to resolve the problems;*
- *interactions with the public, students, parents, stakeholders, consultants, vendors, business partners, and other school jurisdictions; verbal communications such as meetings, telephone calls and face-to-face discussions where significant actions or decision have occurred;*
- *legal agreements of any kind, including contracts, along with supporting documentation;*
- *policy, business planning, performance measurement and budget activities, with supporting documentation;*
- *work done for HPSD by consultants and other external resources; and actions and decisions where payments are made or received, funds committed, services delivered or obligations incurred; and*
- *the history of HPSD: the changes in its organization, departments, staff and programs; facilities and sites; policies, procedures; and relationships with external agencies, including printed documents; provincial government documents which affect the operation of HPSD; curriculum material, and individual school records such as yearbooks and photographs.*

*Essential Records – essential records are those records which an organization requires to operate, records which must be retrievable after a disaster using the Disaster Recovery Plan.*

*Transitory Records – records which have no enduring value to HPSD, no legal requirements for retention and have fulfilled their purpose. Types of transitory records include:*

- *a duplicate: an exact copy of a document filed in an official file system;*
- *a document without any enduring value: information useful only for a brief period of time;*
- *advertising materials: anything that offers a product or service for HPSD to purchase;*
- *blank information media: materials whose purpose is to hold information (e.g. blank forms, blank compact disks);*
- *draft documents and working materials; preliminary versions of intermediate documents, calculations and notes used in the preparation of final versions; and*
- *external publications: books, magazines, pamphlets, software documentation.*

*Records Information Management Program – the supervision and administration of digital or paper records, regardless of format. It provides systematic control over all records from the time of their creation or receipt, through their processing, distribution, organization, storage, and retrieval until their ultimate disposition. The purpose is to apply philosophies and business rules to correctly manage information as dictated by legislative, regulatory, and corporate requirements to maintain and preserve the integrity of HPSD.*

*Record Retention Schedule – a classification system that consists of A Record Number, A Record Series, Scope Notes/Description, Responsible Department, Retention Requirements, and Retention Value. The Retention Requirements shall be in accordance with federal and provincial legislation.*

## **Procedures**

The Records and Information Management procedure applies to all records within all departments and schools of HPSD.

### **1. Acquisition and Upgrade**

- 1.1. The Director of Technology shall review all significant acquisition of information management technologies to ensure the existing infrastructure can support the technology and new technologies fit within the overall architecture of HPSD for software that affects multiple users and/or department-level applications.

- 1.2. The Director of Technology shall review how technology may affect the HPSD's compliance with external requirements (e.g. the Freedom of Information and Protection of Privacy Act) in consultation with the HPSD Information Management.

## **2. Creation and Receipt**

- 2.1. Upon creation or receipt of a record, the receiver or creator will declare them to be corporate records or transitory records.
- 2.2. Corporate records will be managed within the formal records and information management system.
- 2.3. Transitory records handling will be at the discretion of the individual staff members but should be disposed of when no longer useful.
- 2.4. Staff should be cognizant that records they create could be subject to a *Freedom of Information and Protection of Privacy* request.

## **3. Maintenance**

- 3.1. Owners will monitor all corporate records and maintain them according to the Record Retention Schedule and Classification Scheme with the assistance/guidance of the Records Manager.
- 3.2. Owners must be cognizant of the location of all records under their care and control and must be able to locate them to:
  - 3.2.1. support and document our obligations and responsibilities with our partners.
  - 3.2.2. to aid in decision making.
  - 3.2.3. to provide consistency, continuity and productivity in management and administration.
  - 3.2.4. to facilitate the effective performance of activities.
  - 3.2.5. to provide continuity in the event of a disaster.
  - 3.2.6. to meet legislative and regulatory requirements including archival, audit and oversight activities.
  - 3.2.7. to provide protection and support in litigation including management of risks associated with the existence of, or lack of, evidence of organizational activity.
  - 3.2.8. to protect the interests of HPSD and rights of employees, students, clients and present and future stakeholders.
  - 3.2.9. to respond to a *Freedom of Information and Protection of Privacy* request.
- 3.3. The Records Manager shall ensure the retention periods for records:
  - 3.3.1. meet legislated requirements.
  - 3.3.2. support business operations and educational decisions.
  - 3.3.3. provide evidence of educational programs, business transactions or the history of HPSD.
  - 3.3.4. Facilitate service delivery.
  - 3.3.5. Support HPSD's ability to respond to ongoing litigation.
- 3.4. The records retention schedule shall document:
  - 3.4.1. criteria to determine when a record can be closed.
  - 3.4.2. concurrent activities that may override the retention schedule, such as litigation or a historically significant event.
  - 3.4.3. specific storage requirements and migration strategies to facilitate long term retrieval of information.
  - 3.4.4. identification of essential records and the applicable recover practices.
  - 3.4.5. those records which will have archival or research value.
  - 3.4.6. those records which contain personally identifiable information.
  - 3.4.7. the length of time records must be stored on-site and off-site.
  - 3.4.8. opinions from legal, technology and finance.
  - 3.4.9. security procedures.
  - 3.4.10. disposal instructions.
- 3.5. The records retention schedule shall be approved by the Superintendent.

## **4. Staff Responsibilities:**

- 4.1. All staff shall be responsible for:
  - 4.1.1. documenting, creating and organizing HPSD information in the course of their work in a way that is objective and professional.

- 4.1.2. following HPSP record management procedures and respecting the principles of access to information and protection of personal privacy in an open accountability organization.
- 4.1.3. protecting all information while in their custody and control, ensuring the risk of unauthorized disclosure of personal or other confidential information is minimized.
- 4.1.4. making sure they have authority to collect personal information they request.
- 4.1.5. ensuring personal information is used in a way that is consistent with the original purpose of collection.
- 4.1.6. 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.
- 4.1.7. exercising their judgment in refusing to confirm the existence or nonexistence of a record if it is believed that an applicant's knowledge that a record exists or not may pose a danger to an individual or would be an unreasonable invasion of their privacy.
- 4.1.8. assisting individuals in accessing information in accordance with HPSP procedures.
- 4.1.9. taking reasonable steps to verify accuracy of information used to make decisions affecting individuals.

## **5. Preservation and Conversion**

- 5.1. Staff will create records that will preserve the information using media that will enable record preservation equivalent to the retention period.
- 5.2. When staff convert records from one format to the other, the records will be reproduced in complete duplication.

## **6. Storage and Security**

- 6.1. Staff will store all records in such a manner as to prevent unauthorized, accidental or intentional damage, loss, destruction, access, distribution, or theft.
- 6.2. Staff will take all reasonable administrative, physical and technical processes to prevent unauthorized access, use, loss, distribution, destruction or theft.
- 6.3. Staff will store records in accordance with HPSP standards on HPSP's computer network, in paper filing systems and in the Docushare system.
- 6.4. School record management practices shall be maintained in compliance to Administrative Procedure #320 – Student Records.
- 6.5. Student records shall be held at the schools and protected until disposal.

## **7. Retention and Disposition**

- 7.1. Staff will retain all corporate records according to the Record Retention Schedule.
- 7.2. Staff will dispose of records **only with the authorization of the Record Manager** :
  - 7.2.1. by using Form xxx - Request for Destruction of Records.
  - 7.2.2. upon receipt of Form xxx, the Records Manager will contact the school/department to verify the content and advise of a pick up date,
  - 7.2.3. records are to be packaged and clearly labeled "Records for Destruction"
  - 7.2.4. records will be transported via the HPSP internal mail system to the Records Manager at the Learning Support Centre for shredding or shredded at the site only after they have received authorization of the Record Manager and the disposal is recorded in the Records Management Program.
- 7.3. The Superintendent may spare from destruction any record deemed to be of historical value.
- 7.4. Any record deemed to be a transitory record may be destroyed at any time without authorization.
- 7.5. Records subject to litigation and/or audit will not begin their retention scheduled until the litigation and/or audit is settled.
- 7.6. Records to be disposed of shall be disposed in a manner that maintains the confidentiality of the information in the records by shredding, burning or erasure as in electronic storage.

## **8. Disaster Recovery:**

- 8.1. The Director of Technology shall be responsible for the development and maintenance of a methodology for defining, identifying, and protecting essential records.

**HPSD Forms**

[Administrative Form 192A – Instructions](#)

[Administrative Form 192A - Request for Destruction of Records](#)

[Administrative Form 192B - Records Inventory/Transfer](#)

**Cross References**

*Administrative Procedure 320 – Student Records*