



## AP 175 – PRESERVATION AND DISPOSAL OF RECORDS

### BACKGROUND

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Saskatoon Public Schools require that all its official records and public documents shall be preserved and/or disposed of in accordance with relative legislation and under the supervision of the Director or designate. The Director or designate shall ensure the following:

- Adequate facilities are in place to preserve records for the recommended time periods;
- Appropriate security is in place for records in various formats including paper and digital;
- Records are disposed or in accordance with the retention periods outlined in the latest SSBA (Saskatchewan School Boards Association) Records Retention and Disposal Guide for Saskatchewan Schools;
- Authorization and control logs track the disposition of all records are maintained and preserved;
- Education of division staff on the specifics of records management procedures and assist them with orderly and auditable retention and disposal practices.

### PROCEDURES

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1. Storage of Records
  - a. Security:
    - i. All records must be stored in a location with adequate security for the type of information the records contain.
    - ii. Access to records containing personal or confidential information, including employee files and student records must be secured at all times through lock and key, encryption, passwords, etc. such that access is restricted to only those who have the proper authority to access the records.
  - b. Paper Records:
    - i. All records must be stored in a clean, dry place and must not be stored in areas where they might be subject to water damage, mold or infestation.
    - ii. The storage containers must be clearly labeled with record identification including year and full record collection description. Record types should not be mixed in the same container.
    - iii. The location of records storage for each physical site within the division, including schools, must be retained centrally.
    - iv. Any transfer of records within the division (e.g. from schools to central office) must be approved and documented.



- v. Any transfer or storage of records outside of school division property must be approved and details of the transfer and storage agreement must be documented.
  - c. Electronic Records:
    - i. Personal information should not be stored on school division servers, desktops, notebooks or other external storage devices unless the manner of storage, including any safeguards for protection of the information, is approved by the division Privacy Officer. Electronic records should not be printed to paper format and then stored other than those practices that are approved by the division Privacy Officer.
    - ii. Storage of electronic records that have been designated as permanent must include regular migration, refreshing, and security backup.
  - d. E-mail:
    - i. Email retention and use practices in the division should:
      - ♦ Provide for archival processes and procedures that ensure educational continuity and disaster recovery for all email artifacts.
      - ♦ Provide for the communication of information not the dissemination of records. Primary records and information artifacts should be referenced from within email with the specific location of the artifact/record hyperlinked linked for access;
      - ♦ Direct users to refrain from storing email (or using personal archives and cloud services) to other forms such as hard-drives, server stores or printing emails;
      - ♦ Provide for audit trails and system logs to capture selected email store access activity and record destruction by authorized personnel.
    - ii. Archived email messages should be destroyed in accordance with Administrative Procedure 175
  - e. Copies of Documents:
    - i. For ALL records referenced in the SSBA (Saskatchewan School Boards Association) Records Retention and Disposal Guide for Saskatchewan Schools, only one copy (physical or electronic) of a document should be retained by the party responsible for it.
    - ii. Extra copies of documents may be destroyed and the method of destruction used shall be the same method as required in the procedures for destruction for the original document.
2. Disposition of Records
- a. Records disposition is either destruction of records or transfer of records to archives.
  - b. Records disposition shall occur only after the expiry of the retention periods outlined in the latest SSBA (Saskatchewan School Boards Association) Records Retention and Disposal Guide for Saskatchewan Schools.
  - c. Retention Periods
    - i. All division records both at central office and schools will be maintained in accordance with the SSBA (Saskatchewan School Boards Association) Records Retention and



Disposal Guide for Saskatchewan Schools. However, division administrative procedures may set out specific retention periods for specific types of documents not covered in the SSBA guide.

- ii. All questions regarding storage or disposal of records shall be referred to the division Privacy Officer or the person designated by the Board or Director of Education as responsible for the storage and disposal of records.
- d. Transitory Documents
- i. The following items are not considered records and are considered as transitory documents that can be discarded immediately:
    - ♦ junk e-mail and "spam"
    - ♦ telephone message pad pages
    - ♦ Preliminary drafts of letters, reports, and other documents where the final draft is retained.
    - ♦ Drafts and notes may be destroyed except when such documents are important to official business or action of the school or department, in which case they will be stored in the official file.
  - ii. Transitory documents which do not contain personal or confidential information can be discarded by depositing in waste collection or recycling containers.
  - iii. Transitory documents which may possibly contain personal or confidential information shall be disposed of by the use of division confidential shredding utility only.
- e. Conversion to other media
- i. Records may be converted from one medium to another if the following conditions are met:
    - ♦ the integrity of the original information can be maintained; and
    - ♦ the medium to which the record is converted is subject to the same level of protection and access as the original documents.
  - ii. The original record may be disposed of in accordance with this administrative procedure if the information has been converted to another format in accordance with the requirements of this administrative procedure.
- f. Student Records
- i. Each school shall purge cumulative files of unnecessary documents before students go to the next grade level. Secondary Schools should annually execute, in consultation with the Privacy Officer, the purge of cumulative files that have reached the retention periods outlined in the latest SSBA (Saskatchewan School Boards Association) Records Retention and Disposal Guide for Saskatchewan Schools. All documentation related to the destruction of the records should be filed in the division Records Destruction Logs.



- ii. Discipline records shall be shall be purged when a student goes to the next grade except in the case of disciplinary matters which are not settled or which are deemed by the principal to be significant.
    - iii. The principal shall be responsible for ensuring that files are reviewed and that unnecessary documents are purged from the file on an annual basis.
    - iv. The principal may delegate responsibility for this task to a teacher or teachers in the school.
    - v. Any documents purged from a file shall be disposed of in accordance with these administrative procedures.
  - g. Matters Involving Litigation or Potential Litigation
    - i. No record related to pending or anticipated litigation may be destroyed or altered even if the record is technically past its retention date.
    - ii. The storage, preservation and/or retrieval of records when litigation is anticipated or pending shall be under the direction of the Director of Education or designate.
- 3. Disposal of Records:
  - a. Responsibility for Disposal
    - i. All disposals of records shall take place only under the direction of the division Privacy Officer or the person responsible for the destruction of records.
    - ii. The division Privacy Officer or the person responsible for the destruction of records may delegate responsibility for disposal of certain records or certain types of records to other employees of the Board.
    - iii. Any person charged with responsibility for the disposal of records shall ensure that these administrative procedures are followed with regard to such disposal.
  - b. Timing of Disposal
    - i. Records should be destroyed as soon as possible after the approved retention periods have lapsed.
    - ii. If not otherwise specifically provided for, annually schools and Central Office should execute record destruction on items that have lapsed or expired. That destruction should be executed in consultation with the Privacy Officer and all documentation related to the destruction filed in the division Records Destruction logs.
    - iii. All record destructions that include "public documents" under the SSBA (Saskatchewan School Boards Association) Records Retention and Disposal guidelines for Saskatchewan Schools - MUST be presented to the Board for approval prior to the destruction. Documentation on the Board Motion approving the destruction should be filed in the Records Destruction logs along with all documentation related to the actual destruction.
  - c. Methods of Disposal
    - i. Paper Records



- ◆ Paper records shall be destroyed under controlled and confidential conditions by confidential shredding with the division approved contracted services.
  - ◆ Paper records containing confidential or personal information shall not be thrown out by any person along with regular garbage or normal paper recycling. They should be placed into the confidential shred bins provided at schools and Central Office.
- ii. Records containing personal information:
- ◆ Records containing sensitive personal information should be destroyed by employing the use of the division approved and contracted Record Destruction service providers.
  - ◆ Records for off-site for destruction must meet the following conditions:
    - ◇ That the contracted services used are the division approved and contracted Record Destruction service providers;
    - ◇ That all disposal events are fully documented and complete destruction information including the destruction certificate filed in the division Record Retention and Disposal logs.
- iii. Electronic Records:
- ◆ All destruction of electronic records, if done at school division facilities must be fully documented and complete destruction information filed in the division Record Retention and Disposal logs.
  - ◆ Any off-site destruction of electronic records must be done with the division approved and contracted Record Destruction service providers and all disposal events fully documented and complete destruction information filed in the division Record Retention and Disposal logs.
  - ◆ Electronic records should be dealt with by use of a utility or process that removes all data so that it cannot be reconstructed.
  - ◆ Non-erasable media must be physically destroyed.
  - ◆ Storage devices containing electronic records may be disposed of into the locked electronic media bins provided by the division approved and contracted Record Destruction service providers and removed when full. This includes items such as hard drives from computers and photocopiers, which retain information in memory.
- iv. Logs of Record Destruction
- ◆ A log of records destroyed must be prepared and filed by the person who authorizes and/or completes the disposal of the records. That entry should be filed in the division Record Retention and Disposal logs
  - ◆ A log of records destroyed off-site by the division approved and contracted Record Destruction service providers must be prepared and filed by the person who authorizes and/or completes the disposal of the records. In addition all required



documentation prepared by the company for the destruction event must be retained and filed along with the division authorization in the division Record Retention and Disposal logs

- ♦ A log of records destroyed off-site by the division approved and contracted Record Destruction service providers must be prepared and filed by the person who authorizes and/or completes the disposal of the records. In addition all required documentation prepared by the company for the destruction event must be retained and filed along with the division authorization in the division Record Retention and Disposal logs
- ♦ The division Privacy Officer or the person responsible for the destruction of records shall maintain a centralized permanent archive to preserve destruction logs which shall include a description of the records, the date range, numbers of records, and the date, method and person/service responsible for destruction.

#### 4. Donation of Records to Archives

- a. Definition of Public Record - Public record is defined for the purpose of this section as any record that would be accessible to the public pursuant to the provisions of provincial privacy and freedom of information legislation.
- b. Saskatchewan Provincial Archives
  - i. Any public records which may contain information of archival value may be offered to Saskatchewan Provincial Archives if the records have been approved for disposal.
  - ii. Any record that is not a public record and which may contain information of archival value may be offered to Saskatchewan Provincial Archives if the record has been approved for disposal.
  - iii. If after a one year period the Saskatchewan Provincial Archives does not respond to the offer of information (public or non-public) for archive purposes, the information in question may be destroyed and the destruction logged.
  - iv. The following types of records shall not be offered to archives:
    - ♦ medical information of employees or students;
    - ♦ disciplinary records of students or employees; and
    - ♦ any other personal information that may reasonably be considered of a sensitive nature.
  - v. Determinations of archival value shall be made by the division Privacy Officer or the person responsible for the destruction of records in consultation with employees of Saskatchewan Archives.
- c. Local Archives
  - i. Public records may be offered to local community archives if the Privacy Officer is satisfied that the local community archives are able to provide proper storage conditions.
  - ii. Any record that is not a public record shall not be offered to local archives.



## Administrative Procedures Manual ♦ AP 175 – Preservation and Disposal of Records

Reference: Saskatchewan Association of School Board Officials  
(Records Retention and Disposal Guide for Saskatchewan Schools)

Date Last Revised: June 2, 2014