DDSB Ignite Learning

PROCEDURE

Governance (GOV)

PR GOV 13-01

Title: Ontario Student Record (OSR) Management

Adopted: October 20, 2026
Effective: November 13, 2026
Amended/Reviewed: N/A

1.0 RATIONALE

1.1 This Procedure establishes operational requirements for the establishment, maintenance, amendment, access, use, security, retention, transfer and disposal of Ontario Student Records (the "OSR"), including authorized electronic components. It also establishes requirements for student information maintained in the Student Information System where that information supports or forms part of the OSR. The OSR is an official and privileged record maintained to support the improvement of the student's instruction and other education. Its protected status and educational purpose govern decisions about its contents, access and use.

1.2 This Procedure must be interpreted, applied and implemented in ways that uphold Indigenous and human rights and responsibilities, promote accessibility, and prevent and address discrimination and discriminatory barriers. Student information shall be managed in a manner that respects each student's dignity and protects their privacy and confidentiality.

1.3 This Procedure shall be applied in accordance with the DDSB Ontario Student Record (OSR) Management Policy (P GOV 13), Records and Information Management Policy (P GOV 10), Records and Information Management Procedure (PR GOV 10-01), Records Retention and Classification Schedule, Education Act and Ontario Student Record Guideline.

2.0 DEFINITIONS

2.1 Adult Student: A student who is eighteen years of age or older.

2.2 Ontario Student Record (OSR): The official record of a student's educational progress through Ontario schools, established and maintained under the Education Act and the OSR Guideline. The OSR consists of the components required or authorized by the Ministry and the Board, regardless of the authorized format in which they are maintained.

2.3 OSR Folder: The Ministry-prescribed folder (Form 1A) containing the biographical and summary information required by the OSR Guideline.

2.4 Documentation File: The file maintained within the OSR for materials required or authorized by the OSR Guideline and by this Procedure.

2.5 Ontario Student Transcript (OST): The official consolidated record of a secondary student's course achievement, maintained in accordance with the Ontario Student Transcript (OST) Manual

2.6 Office Index Card: An OSR component recording each student's attendance at the school. It is maintained separately from the OSR folder and is not transferred with the OSR.

2.7 Records Retention and Classification Schedule (RRCS): The Board-approved instrument that classifies records, establishes retention triggers and periods, and authorizes disposition.

2.8 Retirement: When a student ceases to be enrolled in school. A transfer to another Ontario school, or a temporary withdrawal approved by the principal, is not retirement.

2.9 Student Information System (SIS): The Board-approved electronic system used to maintain student information, including information used to create or maintain OSR components and other student records.

3.0 RESPONSIBILITY

3.1 Chief Executive Officer: Shall provide executive oversight and accountability for compliance with this Procedure, the Education Act and the OSR Guideline.

3.2 Superintendents and Supervisory Officers: Shall ensure implementation within their portfolios and families of schools, provide direction to principals, and consult Legal Services where required.

3.3 Principals: Shall be accountable for establishing, maintaining, amending, securing, using, retaining, transferring and disposing of the OSR for each student enrolled at their school. Principals shall ensure that corresponding information maintained by school staff in the SIS is accurate and protected. Operational tasks may be delegated to designated staff, but accountability remains with the principal.

3.4 School Staff: Shall perform OSR functions only as assigned, access records only where required by their duties, and comply with the filing, security and sign-out requirements established by this Procedure and its supporting guidance.

3.5 Corporate Records Office: Shall provide direction on classification, retention, disposition, transfer documentation and recordkeeping requirements; maintain the applicable RRCS series; coordinate designated external records requests; and support monitoring and compliance.

3.6 Legal Services and Privacy Office: Shall provide advice and direction regarding disclosure outside the *Education Act* framework, legal process, custody and access disputes, privacy complaints, breaches and privacy impact assessments.

3.7 Inclusive Student Services: Shall maintain designated clinical and professional records separately from the OSR and manage the access and disclosure requirements applicable to those records.

3.8 Information Technology Services: Shall maintain the security, integrity, access controls and auditability of systems containing student information and support approved preservation and disposition processes.

4.0 APPLICATION AND SCOPE

4.1 This Procedure applies to OSRs and their components in all authorized formats, including electronic components maintained in the SIS or another Board-approved system. It covers current and former students' OSRs, including those held by alternative, adult and continuing education schools and programs, and records of closed or consolidated schools.

4.2 The SIS also contains student information that is not part of the OSR. Information does not become part of the OSR solely because it is stored in the SIS. Other student records shall be managed under their applicable RRCS series and Board privacy, information security, records management and program requirements.

4.3 This Procedure applies to all persons authorized to create, access, maintain, use, transfer, retain or dispose of records within its scope. It does not independently authorize access to student information.

5.0 PROCEDURES

5.1 Establishing the OSR

5.1.1 An OSR shall be established when a student first enrols in an Ontario school, in accordance with the OSR Guideline. Where an OSR already exists, the receiving school shall request its transfer under section 5.7.

5.1.2 The student's legal name and date of birth shall be verified and recorded in accordance with Ministry and Board registration requirements. Documents viewed solely for verification shall not be retained unless their retention is otherwise authorized or required.

5.1.3 An Ontario Education Number (OEN) shall be recorded for each student. The existing OEN shall be verified before a new number is requested.

5.1.4 At enrolment, the principal shall ensure that students and the parents/guardians of students under 18 are informed of the OSR's purpose and contents, how to request access or correction, and whom to contact at the school. Provide an accessible format where needed.

5.1.5 Only one OSR shall be maintained for each student. Where a student attends more than one school for program purposes, the OSR shall be maintained by the designated home school.

5.2 Components of the OSR

5.2.1 The OSR shall contain the components required or authorized by the Ministry, including, where applicable:

a. the OSR folder;
b. provincial report cards and Kindergarten Communication of Learning;

c. the Ontario Student Transcript;
d. the Documentation File;
e. the Office Index Card, maintained separately and not transferred with the OSR;
f. the Record of Accumulated Instruction in French as a Second Language; and
g. additional information identified by the principal as conducive to the improvement of the student's instruction.

5.2.2 The OSR folder and its components shall be completed and maintained in accordance with the OSR Guideline and applicable Ministry requirements.

5.2.3 The Office Index Card shall be maintained separately from the OSR folder and shall not be transferred with the OSR. It shall remain at the school or another Board-approved location for the applicable RRCS retention period.

5.2.4 Clinical and professional case files shall be maintained separately from the OSR. Relevant assessment reports may be included in the Documentation File where required or permitted by the OSR Guideline and applicable privacy and consent requirements. When requesting a report, staff shall advise the professional or service provider of its intended inclusion in the OSR and access by authorized persons. Community-based or third-party reports shall be accompanied by the Board's completed and signed third-party report consent form, filed as the cover page. The form is not required for reports prepared by the DDSB's regulated health professionals where consent is documented through Inclusive Student Services. Questions concerning inclusion or consent shall be referred to Inclusive Student Services or the Privacy Office, as appropriate. Requests for removal shall be addressed under section 5.10.

5.2.5 Information prohibited by the Education Act, the OSR Guideline or applicable youth justice legislation shall not be included in the OSR. Information about other individuals shall be included only where authorized.

5.2.6 The principal shall ensure that prohibited information is corrected or removed in accordance with the Retention of Student Identifiers Procedure. Restricted identifiers include health card, social insurance, insurance policy, passport, driver's licence and immigration document numbers. Collection or storage shall occur only where the DDSB has issued written direction and established an approved process. Vaccination information shall not be collected or stored. Prohibited information identified in electronic records shall be reported to the Privacy Office, Corporate Records Office and or IT Service Desk. Changes to those records shall be managed through the coordinated cleanup process.

5.2.7 Discipline records shall be included, retained and removed in accordance with the Code of Conduct and Discipline for Students Procedure, applicable Ministry requirements and the RRCS. A transfer does not authorize their removal.

5.2.8 The Documentation File shall contain required identification and placement decisions and the student's Individual Education Plan (IEP). The filed IEP shall be updated at the end of each school year or semester and when the student transfers. Ontario Regulation 181/98 provides an exception where a parent objects in writing to filing the IEP. The principal shall address such an objection with Inclusive Student Services so the filing requirement and the student's continuing support needs are both addressed.

5.2.9 The principal shall include court orders and agreements describing custody and access arrangements in the OSR, as required by the Privacy Procedure. The principal shall exercise diligence to ensure that these documents are current, accurate and complete and that relevant staff are aware of restrictions affecting access to the student or the student's information. Questions concerning the interpretation or application of an order or agreement shall be referred to the superintendent or Legal Services.

5.2.10 Report cards and Kindergarten Communication of Learning reports shall be filed at the required reporting periods. When a student transfers or retires, staff shall also complete and file any report required for that reporting period. Missing reports shall be requested from the school that issued them.

5.2.11 Records that do not form part of the OSR shall be maintained separately and managed under the applicable RRCS series. Staff shall not use the OSR as a general student file.

5.3 Maintaining the OSR

5.3.1 The OSR shall contain only information required or authorized for inclusion. Routine correspondence, duplicate records, working notes and convenience copies shall not be included unless required.

5.3.2 The principal shall ensure that the OSR is reviewed on receipt, at least annually, and before transfer or retirement. A designated staff member may complete the review, but the principal remains responsible. The review shall address completeness, accuracy, organization and the inclusion of appropriate records.

5.3.3 Corrections and removal of information shall be addressed in accordance with section 5.10. Corresponding information in the SIS shall be updated where applicable.

5.3.4 Health information included in the OSR shall be current and relevant to the student's education and care. Collection and storage shall comply with clause 5.2.6. Related Plans of Care and medication records shall be managed under the Board's applicable medical conditions procedures.

5.3.5 OSR contents shall be organized so that authorized staff can readily locate the information they need.

5.3.6 Completion of the review shall be documented, including the reviewer, date and any required follow-up. This documentation shall be maintained securely and limited to the information necessary to confirm the review and outstanding actions.

5.3.7 The principal or designate shall promptly request missing report cards, IEPs and other required records from the sending school or responsible office. Outstanding records and follow-up shall be documented, and unresolved gaps shall be brought to the principal's attention.

5.3.8 On receipt of an OSR, the principal or designate shall ensure that information concerning immediate learning, accommodation, health or safety needs is promptly brought to the attention of staff authorized to receive it.

5.4 Security and Storage

5.4.1 Paper OSRs shall be stored in locked cabinets or other secure, Board-approved storage accessible only to authorized persons.

5.4.2 OSRs shall be protected during use, transport and temporary removal from storage. The principal shall maintain controls to account for their location and return.

5.4.3 An OSR shall not be removed from the school except for an authorized transfer or another purpose permitted under this Procedure and applicable Board requirements.

5.4.4 Electronic student records shall be maintained in Board-approved systems with access limited to authorized persons and purposes.

5.4.5 Where an OSR cannot be located, the principal shall be notified immediately and shall ensure that a search is initiated. Suspected loss, unauthorized access or disclosure shall be reported through the Board's privacy breach process. The search and any action taken to replace or reconstruct the record shall be documented.

5.5 Access to the OSR

5.5.1 Every student has a right of access to their own OSR.

5.5.2 A parent/guardian of a student under eighteen years of age has a right of access to the student's OSR, subject to applicable law and court orders. Access by a parent/guardian of an adult student requires the student's written consent unless otherwise authorized by law. Questions concerning parental access, including those involving a student aged sixteen or seventeen who has withdrawn from parental control, or the effect of a court order or separation agreement, shall be referred to Legal Services before disclosure.

5.5.3 Requests to examine an OSR shall be arranged through the principal or designate. The requester's identity and authority to access the records shall be verified before access is provided. Examination shall be supervised or facilitated through a Board-approved secure method that protects the integrity and confidentiality of the records. Access to the OSR does not authorize direct access to the SIS or information about other individuals.

5.5.4 Supervisory officers, the principal, teachers and designated early childhood educators may use the OSR for the improvement of the student's instruction and education, as authorized by law. Designated clerical staff may handle the OSR for assigned recordkeeping duties. Educational assistants, interveners, interpreters and other support staff shall be provided with information required for their assigned responsibilities, subject to applicable access and confidentiality requirements. The principal shall ensure that access and disclosure are limited to the information each person is authorized to receive.

5.5.5 Disclosure to a third party requires written consent from the person legally authorized to provide it, unless disclosure is otherwise permitted or required by law. Requests from law firms, the *Office of the Children's Lawyer* and other external parties shall be referred to the Corporate Records Office for coordination with Legal Services or the Privacy Office, as appropriate. Transfers between schools shall be managed under section 5.7.

5.5.6 Requests arising from a subpoena, summons, court order or other legal process shall be managed under section 5.6.

5.5.7 Requests for clinical, health or other student records maintained separately from the OSR shall be directed to the responsible department or records custodian and managed in accordance with applicable legislation and Board requirements.

5.5.8 Formal access or correction requests under the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA) shall be referred to the Privacy Office without delay. A formal MFIPPA request is not required to exercise an existing right to examine the OSR under the Education Act.

5.5.9 Requests by students or parents/guardians for copies shall be managed by the principal or designate, who shall verify the requester's identity, right of access and the records requested. Hard copies shall be provided for collection at the school in accordance with the Privacy Procedure. The release shall be documented, and any accommodation requirements shall be addressed with the Privacy Office. Requests from lawyers and other third parties shall be managed under clause 5.5.5.

5.5.10 A student or parent/guardian entitled to examine the OSR may be assisted by an interpreter, advocate or support person. Before disclosure, the principal shall confirm authorization from the person legally entitled to provide it, the information to be shared and the confidentiality expectations. The accompanying person's participation shall be limited to the authorized assistance.

5.5.11 Students and authorized requesters may contact the current or last school attended to determine where the OSR is held. The principal or designate shall confirm the record's location and direct the request appropriately, subject to any requirement to protect the student's location.

5.6 Legal Matters and Proceedings

5.6.1 A principal who receives a subpoena, summons, court order, search warrant, production order or other legal demand involving an OSR shall preserve the relevant records, immediately notify their supervisory officer and Legal Services, and follow the direction provided by Legal Services.

5.6.2 Access, disclosure or production in response to a legal demand shall be managed in accordance with applicable law and the direction of Legal Services.

5.7 Transfer of the OSR

5.7.1 Transfer of an OSR includes all OSR components other than the Office Index Card. An original OSR may be transferred only to an eligible school in Ontario. This section applies to transfers between DDSB schools and transfers to or from other boards or eligible schools.

5.7.2 Subject to the confidential transfer arrangements in clause 5.7.7, the receiving principal shall request the OSR promptly following enrolment. The sending school shall provide written notification that the OSR will be transferred upon receipt of the receiving principal's written request and shall complete the transfer without unnecessary delay. The receiving school shall follow up on outstanding requests.

5.7.3 OSRs shall be packaged securely, addressed to the receiving principal and transferred using a Board-approved delivery method that protects confidentiality, ensures prompt delivery and permits confirmation of receipt. Transfers outside the DDSB shall use Priority Post or an equivalent method approved by the Board. Where the applicable delivery arrangement is unclear, the principal shall confirm it with the supervisory officer before dispatch.

5.7.4 Transfer of the paper OSR and changes to the student's SIS record are separate required steps. Designated staff shall complete the applicable enrolment, status and access changes in the SIS. Transfer of the OSR does not authorize disclosure of the student's complete SIS record.

5.7.5 Before transferring an original OSR to a private school, or to a federal or First Nation school subject to section 6.2 of the OSR Guideline, the principal shall obtain:

a. a written request confirming that the receiving school accepts responsibility for maintaining, retaining, transferring and disposing of the OSR in accordance with the OSR Guideline; and

b. the required written consent from the adult student or the parent/guardian of a student who is not an adult.

5.7.6 An original OSR shall not be transferred outside Ontario. An exact copy may be sent after receipt of a written request from the receiving educational institution and the required written consent.

5.7.7 Where a student's location must remain confidential because of a shelter or crisis situation, the receiving school shall not contact the sending school directly. The matter shall be referred to the supervisory officer responsible for the receiving school or program, who shall arrange the transfer in a manner that protects the student's location. Transfer documentation and communications shall preserve that confidentiality.

5.7.8 Electronic transmission shall use a secure, Board-approved method that permits accurate reproduction by the receiving school. Required paper components shall also be transferred.

5.7.9 The sending principal shall ensure that the OSR is reviewed and organized before transfer and that necessary corrections or authorized removals are addressed. Missing records and required follow-up shall be identified without unnecessarily delaying the transfer. Questions concerning authority to disclose particular information shall be resolved before that information is sent.

5.7.10 Schools shall maintain secure records of OSR transfers sufficient to confirm dispatch, receipt, location and outstanding follow-up.

5.7.11 Where a student is transferred to preserve school safety, the receiving principal shall ensure that the OSR is received and available before the required transfer meeting, in accordance with the Code of Conduct and Discipline for Students Procedure.

5.7.12 Transfers to publicly funded Catholic schools shall follow the requirements for transfers to another school board. Transfers to religious private schools shall follow the private-school requirements in clause 5.7.5. The receiving school's status and location shall determine the applicable transfer requirements.

5.8 Retirement of a Student

5.8.1 The principal shall ensure that retirement information is recorded in the OSR, including the Office Index Card, and that corresponding SIS information is updated accurately.

5.8.2 A current Ontario Student Transcript shall be completed, retained and provided, where applicable, as required by the OST Manual.

5.9 Retention and Disposition

5.9.1 An adult student or the parent/guardian of a student who is not an adult may submit a written request to the principal to correct inaccurate information or remove information that is not conducive to the improvement of instruction.

5.9.2 OSR components shall be retained and disposed of in accordance with the applicable RRCS series, subject to Ministry and legislative requirements. The RRCS sets out the retention periods and the events that start them. Authorized correction and removal requests shall be addressed under section 5.10.

5.9.3 Before disposal, d designated staff shall verify that retention requirements have been met and that no legal hold, access request, audit, investigation or other preservation requirement prevents destruction. Unresolved questions shall be addressed before disposal.

5.9.4 Inactive OSRs shall remain at the last school attended unless another Board storage arrangement is made through the Corporate Records Office. Schools shall maintain accurate location information when records are moved or a school closes or consolidates.

5.9.5 Disposal shall follow the approval and documentation requirements in the Records and Information Management Procedure. Records shall be destroyed securely, and evidence of the authorized destruction shall be retained.

5.10 Correction and Removal of Information

5.10.1 An adult student or the parent/guardian of a student who is not an adult may submit a written request to the principal to correct inaccurate information or remove information that is not conducive to the improvement of instruction.

5.10.2 The principal shall review the information identified in the request, determine whether correction or removal is appropriate and communicate the decision to the requester.

5.10.3 Where a request is granted, the information shall be corrected or removed, and removed material shall be returned or securely destroyed as required. No record of the granted request shall be retained in the OSR.

5.10.4 If the principal refuses, the requester may ask in writing for referral to the supervisory officer. The officer shall either require the principal to comply or refer the record and request to a person designated by the Minister of Education for a hearing. That person's decision is final and binding.

5.10.5 An unsuccessful written request for correction or removal shall be retained in the Documentation File. Where the request is granted at any stage, the record of the request shall be removed from the OSR. Where the Minister's designate denies the request, the original request, its date and the final decision shall be retained. Corresponding SIS information shall be corrected where applicable.

5.10.6 Formal correction requests under MFIPPA shall be referred to the Privacy Office. Any conflict between an authorized removal and a preservation requirement shall be referred to Legal Services before disposition.

5.10.7 The principal shall identify information that is no longer conducive to the improvement of the student's instruction and arrange authorized removal, return or secure destruction, subject to applicable retention and preservation requirements. Separate clinical and discipline records shall remain subject to their applicable requirements.

5.10.8 Routine corrections to names, dates of birth and other demographic information shall be verified and reflected in the affected OSR and SIS records. Any documentation of the correction shall respect privacy and applicable correction and removal requirements.

5.11 Change of Name and Recorded Identity

5.11.1 For a legal surname change, the principal shall file the supporting document, a copy or verification in the Documentation File. On request, all OSR components shall be updated so that they appear to have been established in the new surname. For a surname used by repute, the principal shall obtain a written request from the adult student or the parent/guardian of a student under 18 and be satisfied that the student is known by that surname and its use is in the student's best interests. The surname shall be recorded in Part A of the folder alongside the legal surname, and the request shall be filed. The confidentiality requirements below shall apply.

5.11.2 The student's chosen name and pronouns shall be respected. Proof of gender identity shall not be required. The principal or designate shall confirm with the student how names and pronouns are to appear in communications and documents, particularly those sent home. The student's gender identity shall remain confidential except where disclosure is authorized by the student or permitted or required by law.

5.11.3 Records shall reflect the student's name and identity while meeting applicable legal recordkeeping requirements. Where disclosure may place the student at risk, staff shall discuss the risks and available options with the student. Concerns about the student's understanding of those risks or applicable legal requirements shall be referred to the superintendent, who may consult Legal Services.

5.11.4 Requests to use or reclaim an Indigenous name shall be handled respectfully, with regard for Indigenous naming conventions. Questions concerning documentation or recording shall be reviewed with Indigenous Education and the superintendent. Technical requirements shall be addressed with Information Technology Services.

5.12 Electronic OSR Components and SIS Information

5.12.1 OSR components may be maintained electronically where permitted by Ministry requirements and approved Board processes. Required information shall remain accessible, secure and capable of accurate reproduction throughout its retention period.

5.12.2 Digitization of paper OSRs shall proceed through a Board-approved process that ensures complete, accurate and accessible records. Scanning alone shall not authorize destruction of the paper record. Any subsequent disposition shall comply with applicable Ministry and Board requirements.

5.12.3 Student information held outside the OSR shall be managed under its applicable RRCS series and Board privacy and information security requirements.

5.13 Monitoring, Audit, and Compliance

5.13.1 The Corporate Records Office shall provide training and practical guidance on OSR management.

5.13.2 Supporting guidance shall provide practical instructions, examples and common tools for filing, review, transfer, access and removal, consistent with this Procedure and applicable Board requirements.

6.0 EVALUATION

This Procedure will be reviewed at least every four (4) years, or earlier if required due to legislative changes or operational needs.

7.0 APPENDICES

Appendix A – Third-Party Consent Form

8.0 REFERENCE DOCUMENTS

- *Education Act*, R.S.O. 1990, c. E.2, including sections 265 and 266.

- Ontario Student Record (OSR) Guideline, 2000, revised 2020.
- Ontario Student Transcript (OST) Manual.
- *Municipal Freedom of Information and Protection of Privacy Act* and R.R.O. 1990, Regulation 823.
- *Personal Health Information Protection Act, 2004*.
- *Human Rights Code*.
- *Children's Law Reform Act*.
- *Divorce Act*.
- *Child, Youth and Family Services Act, 2017*.
- *Youth Criminal Justice Act*.
- *Provincial Offences Act*, Part VI.
- *Enhancing Digital Security and Trust Act, 2024* and applicable regulations.
- Ontario Regulation 261/19, Reciprocal Education Approach.
- R.R.O. 1990, Regulation 293, Fees for Transcripts and Statements of Standing.
- Applicable Ministry Policy/Program Memoranda.

Board Policies and Procedures

- Ontario Student Record (OSR) Management Policy (P GOV 13).
- Records and Information Management Policy (P GOV 10).
- Records and Information Management Procedure (PR GOV 10-01).
- Retention of Student Identifiers Procedure (PR GOV 10-02).
- Records Retention and Classification Schedule (RRCS)
- Code of Conduct and Discipline for Students Procedure (PR WEL 03-01).
- Supporting Children and Students with Prevalent Medical Conditions in Schools Policy (P SCO 09) and applicable procedures.
- Indigenous Education Policy (P IND 01).
- Human Rights, Anti-Discrimination and Anti-Racism Policy (P HRA 01).
- Human Rights Inclusive Design and Accommodation Procedure (PR HRA 01-03).
- Privacy Breach Procedure (PR GOV 06-02).