

Title: Records and Information Management

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Amended/Reviewed: N/A

1.0 RATIONALE

1.1 The Durham District School Board (DDSB) (the “Board”) creates, receives and uses records and information to deliver programs and services, support decision making and meet legal and accountability requirements. These records document educational, administrative, legal and operational activities and must be managed consistently to remain reliable, secure and accessible.

1.2 Effective records and information management ensures compliance with the Education Act, MFIPPA, PHIPA, the OSR Guidelines, the Canada Evidence Act, Bill 194 and other applicable legislation. It supports accountability, protects privacy, improves service delivery, reduces information-related risks and preserves the Board’s institutional memory.

1.3 This Procedure establishes Board-wide requirements for creating, classifying, maintaining, protecting, retaining and disposing of records in accordance with the *Records Retention and Classification Schedule (RRCS)*. It ensures that records across all formats can be located, retrieved and managed in a consistent and defensible manner.

2.0 DEFINITIONS

2.1 Record: Any recorded information, however recorded, whether in printed form, on film, by electronic means, or otherwise, consistent with the definition in MFIPPA. This includes correspondence, memoranda, plans, machine readable records, and any other documentary material regardless of physical form or characteristics.

2.2 Official Record (Business Record): A record that provides evidence of the Board's business activities, decisions, or transactions. These records have administrative, fiscal, legal, or historical value and must be retained according to the RRCS.

2.3 Transitory Record: A record of temporary usefulness that is not required to control, support or document the delivery of programs or to carry out operations. Examples include “cc” or “FYI” copies of emails, meeting invitations and drafts where the final version is filed.

- 2.4 Records Retention and Classification Schedule (RRCS):** The Board-approved instrument that identifies record series, assigns classifications and specifies the required retention period and final disposition for each series. It is the authoritative framework for organizing records, determining how long they must be retained and ensuring their proper disposition in compliance with legal, operational and accountability requirements.
- 2.5 Disposition:** The final action taken with a record after its retention period has expired. This includes secure destruction, transfer to the Board's archival holdings or authorized transfer to another institution when appropriate.
- 2.6 Records and Information Management (RIM):** The systematic management of the creation, receipt, use, storage and disposition of recorded information throughout its lifecycle.
- 2.7 Legal Hold (Record Hold):** A temporary suspension of routine records destruction when records may be required for a legal proceeding, investigation, audit or access request. All records subject to a legal hold must be preserved in their existing form until the hold is formally lifted.
- 2.8 Personal Information (PI):** Recorded information about an identifiable individual, including but not limited to race, national or ethnic origin, religion, age, sex, sexual orientation, marital or family status, medical or psychological history, criminal or employment history and personal identifiers such as the Ontario Education Number, that can reasonably be used to identify a specific person.
- 2.9 Metadata:** Data that describes the context, content and structure of records and supports their management through time, such as title, author, date created, date modified, file size and classification code. Metadata supports the authenticity, reliability and integrity of electronic records.
- 2.10 Vital Record:** A record essential to maintaining or restoring critical Board operations or confirming the Board's legal or financial standing following an emergency or disruption.

3.0 RESPONSIBILITY

- 3.1** Effective records and information management is a shared responsibility across all levels of the Board.
- 3.2 Director of Education**
- a) Provides executive oversight and accountability for the RIM Program.
 - b) Approves administrative procedures required to implement the RIM Policy.
 - c) Issues legal holds when required to preserve records relevant to legal, audit or investigative processes.
- 3.3 Associate Directors, Supervisory Officers, Senior Leadership**

- a) Ensure implementation of and compliance with the RIM Program and RRCS within their portfolios and families of schools.
- b) Allocate resources and designate staff to support records management activities.
- c) Supports and Facilitates reviews and audits of recordkeeping practices.

3.4 Corporate Records Office

- a) Leads the RIM Program, including maintenance of the Functional Classification Scheme and the RRCS.
- b) Provides training, guidance and subject matter expertise to schools and departments.
- c) Monitors compliance and conducts periodic reviews.
- d) Manages off site storage arrangements and reviews destruction documentation.
- e) Coordinates archival review and transfer.

3.5 Principals, Managers and Supervisors

- a) Ensure staff follow required procedures for classification, retention, security and transfer of records.
- b) Oversee the annual review and clean up of student, school and departmental records.
- c) Ensure secure physical and electronic storage of records within their area.
- d) For student records, ensure compliance with the Education Act, OSR Guideline and any related Board procedures.

3.6 All Staff and Board Representatives

- a) Create and maintain complete, accurate records that document Board operations.
- b) Store records in approved systems in accordance with the RRCS.
- c) Protect records from unauthorized access, loss, or damage.
- d) Dispose of transitory records when no longer required and when not subject to a legal hold.
- e) Respond promptly and fully to legal hold directives.

4.0 APPLICATION AND SCOPE

This Procedure applies to all recorded information in the custody or control of the Board that is created, received or maintained in the course of Board business, regardless of format, system or storage location. It excludes Transitory Records, which may be securely disposed of once no longer required and when no legal or record hold is in place.

This Procedure applies to all DDSB employees, Trustees, and volunteers, contractors and consultants acting on behalf of the Board.

5.0 PROCEDURES

5.1 Records Lifecycle and General Requirements

5.1.1 The Board will maintain a Records and Information Management (RIM) Program that ensures accountability, transparency, and responsible oversight of recorded information.

5.1.2 Recorded information must be created, collected, and managed in approved systems that meet operational, legal, fiscal, and regulatory requirements.

5.1.3 Records must be clearly organized and described to ensure they are accurate, complete, current, and easy to locate.

5.1.4 Records must be accessed or shared only by individuals whose roles require the information. Access will be managed through role-based permissions. Internal sharing must support authorized functions, and external disclosure must comply with applicable legislation, Board policies, and privacy expectations.

5.1.5 Records may be shared internally for authorized purposes and must only be disclosed externally in accordance with legislation and Board policy.

5.1.6 Records must be retained and disposed of in accordance with the Records Retention and Classification Schedule (RRCS). Records of long-term value must be preserved.

5.1.7 Records must remain accessible for their retention period and be protected against loss, unauthorized access, or improper alteration.

5.1.8 Transitory records must be deleted or securely destroyed when no longer required, unless subject to a legal hold.

5.1.9 Records subject to a legal hold or investigation must not be altered or destroyed until the hold is formally lifted.

5.2 Records Retention and Classification Schedule (RRCS)

5.2.1 The Records Retention and Classification Schedule (RRCS) is the Board's approved authority for the retention and disposition of all DDSB records.

5.2.2 No record may be destroyed, deleted or removed from Board custody except in accordance with the RRCS, supported by the required disposition documentation, or when restricted by a legal hold or other authorized direction.

5.3 Functional Structure

The RRCS is organized using a Functional Classification Scheme that groups record series by the Board's main business functions to support consistent classification, retrieval, retention, and disposition.

Class Code	Functional Area	Description
ADM	Administration Management	Administrative management and corporate support functions
COM	Communications Management	The function of planning and delivering internal and external communications, including media relations, public relations, issues management, and stakeholder and community engagement
FAM	Facilities Management	The function of planning, operating, maintaining, and renewing Board facilities and sites, including capital projects, maintenance, custodial services, and plant operations.
FIN	Financial Management	The function of planning, managing, and reporting on the Board's financial resources, including budgeting, accounting, procurement, payroll, and financial reporting.
GOV	Governance	The function of governing the Board, including Board and committee meetings, strategic direction, policy development, by laws, and Trustee activities.
HSM	Health and Safety Management	The function of promoting and managing workplace and student health and safety, including inspections, incident reporting, emergency preparedness, and health and safety programs.
HRM	Human Resources Management	The function of managing the employment lifecycle, including recruitment, staffing, employee records, labour and employee relations, performance, compensation, benefits, and wellness.
IMS	Information Management Services	the function of managing records and information, including classification, retention and disposition, privacy and access to information, and archival activities.
ITS	Information Technology Services	The function of planning, delivering, securing, and supporting information and communications technology, systems, applications, networks, and related services.

LSM	Legal Services Management	The function of providing and coordinating legal services, including legal advice, contracts and agreements, investigations, claims, litigation, and regulatory compliance.
PDD	Program Design and Development	The function of implementing curriculum and designing, reviewing, and supporting instructional programs, courses, and related learning resources.
PRM	Planning and Research Management	The function of conducting research, analysis, and planning to support system improvement, enrolment and accommodation planning, program and facilities planning, and statutory and strategic reporting.
SSS	Student Services	The function of providing and coordinating student programs, services, and supports, including registration, OSR management, IEPs, guidance, marks, special education, clinical support services.

5.3.1 Each record series in the RRCS includes the following fields:

Field	Definition
Class Code	The alphanumeric identifier assigned to the functional area and specific record series, used to classify and retrieve records consistently.
Record Series Title or Activity	The official name of the record series that reflects the business activity, function, or process documented.
Description	A summary of the types of records included, outlining scope and any key inclusions or exclusions.
Retention Trigger	The event that starts the retention period, such as file closure, project completion, current year end, contract expiry, student retirement, or employee termination.
Retention Period	The length of time records must be kept after the retention trigger, based on legal, regulatory, operational, and accountability requirements.
Disposition	The required action when the retention period expires, such as secure destruction or archival review, completed in accordance with Board RIM procedures.
Responsible	The department, school or originating area accountable for

Department	maintaining the official version of the record throughout its lifecycle and ensuring the RRCS is applied correctly.
Notes or Citations	Legislative references, policy citations, or special handling instructions such as secure storage requirements or OSR inclusion.

5.3.2. The RRCS uses the following retention and disposition codes:

Code	Description
Current Year (CY)	Retention calculated from the end of the current school or fiscal year (September 1 to August 31)
Event (E)	Retention begins once a defined event occurs, such as file closure, project completion, student retirement, contract expiry or employee termination.
Archival Review (AR)	At the end of the retention period, records are assessed for long term business or historical value. Records selected for preservation are transferred to archives; remaining records are destroyed.
Destroy (D)	Records are securely destroyed or deleted once retention requirements are met, and no legal hold applies. Sensitive and confidential information must be destroyed using approved secure methods.

5.4 Applying the RRCS

Staff must use the RRCS in a consistent way to make sure records are classified, kept and disposed of properly. When working with records, staff must:

- Identify the Correct Record Series:** Choose the record series that best matches the activity or process the records relate to. Use the functional area, series description and examples to confirm you have the right match. If more than one seems possible, use the series that reflects the main purpose of the records.
- Classify and Organize Records:** Apply the correct class code and series title when saving or filing records, whether physical or digital. Records should be stored in the folders or systems that match the chosen series. File plans and naming conventions will be developed with departments and the Corporate Records Office to help keep records organized and easy to find.
- Confirm the Retention Trigger and Period:** Check the RRCS to find out when the retention period starts and how long the records must be kept. Make sure any key trigger events, such as a project ending, a student retiring, or a contract

- expiring, are documented so the retention period can be calculated correctly.
- d) **Keep Records for the Required Time:** Keep the records complete, accessible and protected until the full retention period has passed. Records must not be deleted or destroyed early unless required by a legal hold or authorized direction.
 - e) **Review Records for Disposition:** At least once each year, or as part of regular business processes, identify records that have reached the end of their retention period. Confirm there is no legal hold, audit activity or operational need that would delay disposition.
 - f) **Prepare Records for Disposition:** Complete the required records disposition documentation before records are destroyed or sent for archival review. This provides a clear record of what was disposed of and why.
 - g) **Carry Out the Approved Disposition:** After approval, destroy records securely using Board approved methods, or transfer records to the Corporate Records Office for archival review if required by the RRCS. No records can be destroyed without documented approval.
 - h) **Ask for Support When Needed:** Contact the Corporate Records Office if you are unsure about classification, retention, disposition, file plans or naming conventions.

5.5 Maintenance, Security, Storage

5.5.1 Records must be stored in secure, Board approved environments that protect against loss, damage, unauthorized access, and inappropriate alteration.

5.5.2 Physical records containing personal or sensitive information must be kept in locked cabinets or secure rooms when unattended.

5.5.3 Electronic and cloud-based records must be stored only in Board approved systems of record with appropriate access controls, audit capability, and security safeguards; personal cloud accounts must not be used for Board business.

5.5.4 Email and other digital communications that document official business must be captured in the appropriate system of record and managed in accordance with the RRCS; transitory messages must be deleted once they are no longer required.

5.5.5 Digitization projects intended to replace paper records must follow Board approved procedures and standards.

5.6 Disposition

5.6.1 Each school and department must review its records regularly, at least annually, to identify records that have met their retention period and are not subject to a legal hold.

5.6.2 Destruction of records must be carried out in a secure manner that prevents reconstruction or retrieval.

5.6.3 Significant or recurring destruction activities must be documented using an

approved destruction or disposition form and retained as evidence of proper disposal.

5.6.4 Records identified for Archival Review must be assessment and potential preservation in consultation with the Corporate Records Office.

5.7 Legal Holds

5.7.1 When litigation, an investigation, audit, or access request is reasonably anticipated or underway, Legal Services or the Director of Education may issue a legal hold.

5.7.2 Upon receipt of a legal hold, staff must immediately suspend destruction of any records identified in the hold notice, including transitory records, and preserve them in their existing form.

5.7.3 Legal holds shall remain in effect until formal written notice is provided that it has been lifted.

6.0 MONITORING, AUDIT, AND COMPLIANCE

6.1.1 The Corporate Records Office will provide training and guidance on this Procedure, the RRCS, related policies, and associated program practices and tools.

6.1.2 Management must ensure that employees in their area are aware of the records that apply to their work and the correct use of the RRCS.

6.1.3 Compliance with this Procedure may be monitored through periodic reviews for improvements.

7.0 EVALUATION

This Procedure will be reviewed at least every four (4) years, or earlier if required due to legislative changes or operational needs, to ensure continued alignment with the Board's RIM Policy, the RRCS and leading practices in records and information management.

8.0 APPENDICES

N/A

9.0 REFERENCE DOCUMENTS

- DDSB's Records Retention and Classification Schedule (RRCS)
- Education Act, R.S.O. 1990
- Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)
- Personal Health Information Protection Act (PHIPA)

- Ontario Student Record (OSR) Guideline
- Canada Evidence Act
- Electronic Commerce Act
- Bill 194, Strengthening Cyber Security and Building Trust in the Public Sector Act, 2024, including the Enhancing Digital Security and Trust Act, 2024
- Accessibility for Ontarians with Disabilities Act (AODA)
- Ministry of Education Policy and Program Memoranda