

Title: Records and Information Management

Adopted: February 18, 2026

Effective: February 19, 2026

Amended/Reviewed: N/A

1.0 RATIONALE

The Durham District School Board (DDSB) (the “Board”) creates and manages recorded information across all areas of its operations. When properly managed, records with ongoing value function as information assets that support effective program and service delivery, informed decision making, operational continuity, accountability, transparency and public trust. They enable institutional memory, ensure legal compliance, and reinforce information governance across the organization.

In accordance with subsection 171(1), paragraph 38 of the Education Act, the Board is required to establish a program of records management, including schedules for the retention, disposition and destruction of records, other than those retained for archival purposes.

The Records and Information Management (RIM) Policy (the “Policy”) establishes the DDSB’s RIM Program to ensure that recorded information in the custody or under the control of the Board is managed securely, consistently and in compliance with legislative obligations and public sector standards.

2.0 OBJECTIVE

The purpose of this Policy is to establish clear requirements for the consistent, accountable and secure management of recorded information across the Durham District School Board (DDSB).

The Records and Information Management (RIM) Program enables the Board to:

- meet its legal, regulatory and fiduciary obligations
- support efficient and informed decision making
- protect the integrity, confidentiality and accessibility of information
- maintain reliable evidence of operations, programs, transactions and decisions
- preserve institutional memory and enable continuity of service
- manage risk, reduce duplication and ensure appropriate use of resources

3.0 DEFINITIONS

- a) **Records and Information Management (RIM):** The systematic

- management of the creation, receipt, use, storage and disposition of recorded information throughout its lifecycle.
- b) **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.
 - c) **Information:** Any data or content created, collected, used or maintained for Board purposes.
 - d) **Official Record (Business Record):** The authoritative Board record that documents and provides evidence of a Board decision, transaction, activity, policy, approval, obligation, or business process. Official Records have ongoing operational, legal, financial, administrative, and or historical value and must be captured and retained in an approved Board recordkeeping system in accordance with the RRCS (and any applicable holds).
 - e) **Records Retention and Classification Schedule (RRCS):** The Board-approved instrument that identifies record series, assigns a classification, and specifies the retention trigger, retention periods, and authorized disposition for each series. The RRCS is established under the Education Act and supports MFIPPA compliance (including Ontario Regulation 823 minimum retention requirements for personal information) and OSR Guideline requirements for student records.
 - f) **Transitory Record:** A record of short-term usefulness that is not required to document, support, or evidence the delivery of Board programs, services, decisions, approvals, or operations. Transitory Records may be disposed of when no longer needed for reference, provided they are not subject to a Legal Hold, audit, investigation, or an active access (Freedom of Information) request.
 - g) **Legal Hold (Record Hold):** A temporary suspension of routine disposition activities when records may be required for litigation, investigation, audit, complaint review, or an access request. A Legal Hold requires preservation of all relevant records (across all formats and locations) until the hold is formally lifted by the Board authority responsible for the hold.
 - h) **Personal Information (PI):** Recorded information about an identifiable individual, as defined in MFIPPA. Personal Information may include identifiers (e.g., Ontario Education Number), contact information, demographic details, and information about an individual's education, employment, medical, psychological, or criminal history, where the individual can reasonably be identified.
 - i) **Ontario Student Record (OSR):** The official student record as defined in the Ministry of Education's Ontario Student Record (OSR) Guideline.

4.0 RESPONSIBILITY

The *Director of Education* is responsible for the implementation, communication and oversight of this Policy and may issue administrative procedures and assign

operational responsibilities in support of the Corporate RIM Program.

All employees and individuals acting on behalf of the Board, including trustees, volunteers, contractors and third-party service providers are responsible for managing records and information in accordance with this Policy, related procedures and the Board's Records Retention and Classification Schedule (RRCS).

The *Governance and Policy Committee* will review the policy prior to Board approval.

5.0 APPLICATION AND SCOPE

This Policy applies to all records and information in the custody or under the control of DDSB, regardless of format, system, platform, location or medium. This includes paper documents, electronic records, email, structured data, audio, video, web and cloud based content, and other media.

All records created, collected, maintained, or received in the conduct of DDSB business operations are the property of Board.

6.0 POLICY STATEMENT

- 6.1 The Durham District School Board (DDSB) is committed to the proper management of all recorded information in its custody and control that serves as evidence of decisions, transactions, programs and operations.
- 6.2 Recorded information shall be managed as a valuable information asset that supports accountability, service delivery, legal compliance and operational consistency.
- 6.3 The Board acknowledges Indigenous data sovereignty and is committed to respectful engagement with Indigenous partners when developing practices that may impact Indigenous communities, in alignment with the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the Truth and Reconciliation Commission's Calls to Action.
- 6.4 Establish and maintain a Records and Information Management (RIM) Program in accordance with the Education Act, including retention schedules for the classification, preservation, disposition and secure destruction of records, except where archival retention is required.
- 6.5 The ARMA International's Generally Accepted Recordkeeping Principles (GARP) (the "principles") shall guide how official recorded information is managed across the DDSB. The principles include:
 - a) **Accountability:** Recorded information shall be managed under clearly defined roles and responsibilities to ensure oversight and ownership.
 - b) **Transparency:** Processes and decisions related to recorded information shall be documented to support traceability and institutional trust.
 - c) **Integrity:** Information shall be protected against unauthorized alteration to

ensure its authenticity, reliability and completeness.

- d) **Protection:** Safeguards shall be applied to prevent unauthorized access, use, disclosure or loss, based on the sensitivity of the information.
- e) **Compliance:** Recorded information shall be managed in accordance with all applicable legislation, regulations, directives and Board policies.
- f) **Availability:** Information shall be organized and stored to allow timely and appropriate access by authorized users for as long as needed.
- g) **Retention:** Records shall be retained only as long as required to meet operational, legal, fiscal and historical obligations, in accordance with the Board's approved schedule.
- h) **Disposition:** Records shall be securely and permanently disposed of, or preserved where required, once retention requirements have been met and disposition is authorized.

7.0 POLICY DIRECTIVES

7.1 The Durham District School Board (DDSB) shall:

- 7.1.1 Maintain a Board-approved Records Retention and Classification Schedule (RRCS) and ensure all records are classified, retained and disposed of only as authorized by the schedule and applicable legislation.
- 7.1.2 Manage recorded information consistently throughout its lifecycle, from creation or receipt through classification, maintenance, storage and final disposition, to ensure it remains secure, reliable, authentic, and accessible for as long as required.
- 7.1.3 Ensure personal information is collected, used, disclosed and protected in compliance with MFIPPA, PHIPA, the Ontario Student Record (OSR) Guideline and other applicable legislation.
- 7.1.4 Prohibit the destruction, deletion, alteration or removal of records except as authorized by the retention schedule, legislation or a legal hold.
- 7.1.5 Apply legal holds when litigation, audits, investigations or access requests are reasonably anticipated or underway, and maintain holds until formally lifted.
- 7.1.6 Ensure that all information systems used to manage records support lifecycle management, access control, retention and secure disposition.
- 7.1.7 Provide training and guidance to staff, trustees, and other authorized users to support compliance with this Policy and related procedures.
- 7.1.8 Ensure that personal and personal health information is managed in accordance with applicable privacy and access legislation and Board policy.
- 7.1.9 Monitor compliance with this Policy and take corrective action as required

under Board policies, procedures and applicable law.

8.0 EVALUATION

This Policy shall be evaluated every five (5) years to ensure relevance, effectiveness, and alignment with DDSB's strategic priorities and legislative requirements.

This Policy shall be monitored on an ongoing basis and formally evaluated every five years to ensure continued relevance, effectiveness, and alignment with DDSB's strategic priorities and legislative requirements.

9.0 COMMUNICATION

All policies will be published on the DDSB public website in an accessible format and shared with relevant DDSB community members and education partners.

10. APPENDICES

N/A

11. REFERENCES

- Education Act
- Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)
- Personal Health Information Protection Act (PHIPA)
- Ontario Student Record (OSR) Guideline
- Bill 194, Strengthening Cyber Security and Building Trust in the Public Sector Act
- Archives and Recordkeeping Act, 2006
- DDSB Records Retention and Classification Schedule (RRCS)
- DDSB Records and Information Management Procedure (PR-GOV-10-01)
- ARMA International: Generally Accepted Recordkeeping Principles
- Related DDSB policies and administrative procedures