

Administrative Procedure 180

General Administration

RECORDS RETENTION AND DISPOSITION

BACKGROUND

Records in the custody of, or under the control of the Charter Board, including any record containing personal information, shall be created, maintained, retained, accessed, and disposed of in accordance with the *Protection of Privacy Act (POPA)*, the *Access to Information Act (ATIA)*, the *Education Act* and the *Student Record Regulation*, and this Administrative Procedure.

The purposes for retaining records include:

- Supporting effective decision-making, operations, and governance;
- Ensuring compliance with legal, fiscal, and accountability requirements;
- Protecting the privacy and security of personal information;
- Facilitating appropriate access to information in accordance with ATIA; and
- Preserving records of enduring administrative, legal, or historical value.

DEFINITIONS

Record	Information in any recorded form, including but not limited to documents, correspondence, reports, personnel files, meeting minutes, emails, digital files, photographs, student records, and system-generated data.
Transitory Records	Records of temporary usefulness that are not required to meet operational, legal, or accountability requirements (e.g., draft notes, routine correspondence, duplicate copies).
Personal Information	Information about an identifiable individual as defined under POPA, including but not limited to name, contact information, demographic information, identifying numbers, and educational or employment information.
Access Request	A formal request under ATIA to access records held by the Charter Board.

PROCEDURES

1. Records Management and Protection
 - 1.1. All records shall be managed in accordance with an approved records and information management program.
 - 1.2. Records must be protected against unauthorized access, use, disclosure, alteration, or destruction, in accordance with POPA.
 - 1.3. Appropriate administrative, technical, and physical safeguards must be implemented to protect records.

- 1.4. Access to records containing personal information shall be limited to individuals with a legitimate educational or operational need, in accordance with the need-to-know principle.
2. Electronic Records
 - 2.1. Electronic records must be created, maintained, and stored to ensure authenticity, integrity, and reliability.
 - 2.2. Digital systems must align with privacy-by-design principles, including secure storage, controlled access, and audit capabilities.
3. Retention and Disposition
 - 3.1. A Records Retention and Disposition Schedule shall identify what records are retained, retention timelines, and final disposition (destruction or archival preservation). The Charter Board adopts the ASBOA Records Retention and Disposition Schedule as the foundation for its records management practices, as amended from time to time.
 - 3.2. Records shall not be destroyed if there is an active or pending ATIA request, or if there is ongoing or anticipated litigation, investigation, or audit.
 - 3.3. Each school or department is responsible for maintaining records in accordance with the approved Records Retention and Disposition Schedule and preparing records for secure disposition.
 - 3.4. Destruction of records must be approved by the Secretary-Treasurer or Treasurer to the Board, be conducted using secure destruction methods (e.g., shredding, secure digital deletion), and be documented for accountability purposes. A record of destruction shall be maintained in accordance with the Records Retention and Disposition Schedule.
4. Student Records
 - 4.1. Student records shall be managed in accordance with the *Student Record Regulation* and POPA. Formal access requests for student records shall be managed in accordance with ATIA.
 - 4.2. Student records must be accurate, complete, and updated annually, contain information necessary to support educational decision-making, and be stored securely and treated as highly confidential.
 - 4.3. Access to student records shall be limited to authorized staff and parents/guardians or eligible students, as permitted by legislation.
 - 4.4. Transfer and retention of student records shall comply with provincial requirements
 - 4.5. Additional procedures are outlined in AP - 360 Student Records.
5. Personnel Records
 - 5.1. Personnel records shall be securely stored and treated as confidential.
 - 5.2. Access is restricted to authorized individuals in accordance with POPA.
 - 5.3. Additional procedures are outlined in AP - 403 Personnel Records.
6. *Access to Information Act (ATIA)*
 - 6.1. Individuals have the right to request access to records under ATIA, subject to legislated exceptions.
 - 6.2. All formal access requests shall be directed to the designated Access and Privacy Coordinator.
 - 6.3. The Charter Board will respond within legislated timelines, provide access in accordance with ATIA, and apply appropriate exceptions where required.

7. *Protection of Privacy Act (POPA)*
 - 7.1. The Charter Board will maintain a Privacy Management Program (PMP) to ensure compliance with POPA.
 - 7.2. *Privacy Impact Assessments (PIAs)* will be conducted where required, including for new programs and new technologies or systems involving personal information.
 - 7.3. All staff are responsible for protecting personal information, completing required privacy training, and reporting any privacy breaches immediately.
8. Privacy Breach Response
 - 8.1. Any actual or suspected privacy breach must be reported immediately to the Superintendent or designate.
 - 8.2. The Charter Board will contain and assess the breach, notify affected individuals where required, report to the Office of the Information and Privacy Commissioner (OIPC) if applicable, and implement corrective actions.
9. Technology and Security
 - 9.1. The Charter Board will implement technologies that support secure records management.
 - 9.2. Systems must include safeguards such as user authenticity, access controls, and data encryption (where appropriate).

Legal Reference: *Education Act*
Protection of Privacy Act (POPA)
Access to Information Act (ATIA)
Student Record Regulation

Cross Reference: AP-360 Student Records
 AP-403 Personnel Records

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