

POLICY AND PROCEDURES

POLICY NAME: Records Management	POLICY NUMBER: 1.2.2	CATEGORY: Administration
RESPONSIBLE EXECUTIVE: Registrar	APPROVAL AUTHORITY: Executive Council	EFFECTIVE DATE: October 23, 2020
NEXT FULL REVIEW DATE: October 22, 2025 or amended by FISA	REVISED: DRAFT: August 21, 2020	REPLACES:

Purpose

The purpose of this policy is to determine standards and procedures for the collection of student information at Coquitlam College – Brookmere Secondary (the School). This includes the storage, use, disclosure, transfer and protection of all information.

Scope

This policy applies to all Senior Secondary staff.

We follow the rules under the BC Student Records Requirements and Best Practices Policy.

Policy Statements

1. The school authority may add, modify, or remove portions of Coquitlam College Student Records Requirements and Best Practices Policy when it is considered appropriate to do so, if it is not in conflict with legal requirements and government policy.
2. Coquitlam College is committed to ensuring that student records are handled in accordance with all legal requirements.
3. The College will appoint a lead administrator who is responsible for the establishment, security and maintenance of the Student Record and Student File for each student registered in the school.
4. The College will only collect, use or disclose personal information with the consent of the individual student or legal guardian.
5. On or before collecting personal information, the College will disclose to the individual student verbally or in writing the purposes for the collection of personal information.
6. The College will only collect, use or disclose personal information for purposes that a reasonable person would consider appropriate in the circumstances and that fulfill the purposes disclosed by the school.
7. Access to secure Student Records and Student Files will be restricted to those individuals who, by the nature of their work, are required to have access to the information.
8. The College will provide access to personal information about an individual student to the individual student and to a parent or legal guardian of the individual student during school hours and under the supervision of the lead administrator or designate.
9. Subject to legal requirements, the College will retain personal information only for the period of time required to fulfill the purpose for which it was collected.
10. Concerns, complaints and questions regarding the handling of personal information by the College, may be directed to the school’s Principal or Vice-Principal.

Procedures

1. Teachers must have permission from the administration to access student records.
2. All students' files must remain within the administrative area or in the hands of a counselor.
3. Computer records are protected by password codes (accessed by administrative staff only).
4. Permanent Student Records are updated three times a year (April, August, December).
5. The lead administrator or designate will be responsible for:
 - a. Updating the PSR Form 1704 as information changes and the student progresses through the system;
 - b. Ensuring that electronic copies of documents are stored on a server in a physically secure location. If information is accessed through the Internet, an encrypted connection (<https://>) must be established before authenticating. Access is restricted to those employees (such as designated records clerks, administration, teachers, and counsellors) who, by the nature of their work, are required to have access; and
 - c. Ensuring that the school authority takes necessary precautions to safeguard against deprecated or obsolete forms of storage. The electronic storage of PSRs and other personal information requires the school authority to have an adequate backup plan and recovery strategy for potential hardware failure and database corruption.

Student Records – Active Students

6. Student Records are locked in the main office in cabinets and copies of the PSRs are filed in a fireproof and waterproof cabinet. Access is restricted to those employees (such as designated records clerks, administrators, teachers, and counsellors) who, by the nature of their work, are required to have access.
7. The school authority protects personal information from unauthorized access, collection, use, disclosure, copying, modification, or disposal, or similar risks. Procedures for such protection are outlined in Access to and Disclosure of Student Records and Transfer of Secondary Student Records (page 4) below.
8. The lead administrator or designate will regularly review Student Records to ensure that the information is current and complies with legal requirements. Required inclusions must be listed on the PSR – see Definitions – Permanent Student Record (For 1704) Inclusions (page 5) below.

Student Records – Inactive Students

9. Unless another school requests a Student Record (see Transfer of Student Records (page 4) below), the school authority archives Student Records for 55 years after a student has withdrawn and not enrolled in another K-12 school, or graduated from the school.
10. The archived Student Records are stored securely and in a manner that ensures their preservation from calamity (fire, flood, etc.) Access is limited to the lead administrator or designate.
11. The designated records clerk keeps a record of Student Records that are destroyed (shredded) after 55 years.

Student Files – Active Students

12. Student Files are locked in the main office in cabinets and copies of the PSRs are filed in a fireproof and waterproof cabinet. Access is restricted to those employees (such as designated

POLICY AND PROCEDURES

records clerks, administrators, teachers, and counsellors) who, by the nature of their work, are required to have access.

13. The school authority protects personal information from unauthorized access, collection, use, disclosure, copying, modification, or disposal, or similar risks. Procedures for such protection are outlined in Access to and Disclosure of Student Records and Transfer of Secondary Student Records (page 4).
14. The lead administrator or designate will regularly review Student Files to ensure that the information is relevant and important to the educational program of the student.

Student Files – Inactive Students

15. The school authority archives Student Records for 55 years after the student has withdrawn and not enrolled in another K-12 school, or graduated from the school.
16. The archived Student Records are stored securely and in a manner that ensures their preservation from calamity (fire, flood, etc.) Access is limited to the administration or designate.
17. The lead administrator or designate is responsible for determining the relevancy of the contents in Student Records before being archived.

Currency of Student Records

18. Student eligibility information will be updated during student registration each semester.
19. As stated above, the lead administrator or designate will regularly review Student Records and Student Files to ensure that the information is current and complies with legal requirements.

Security of Student Information Off Campus

20. The lead administrator is responsible for ensuring that personal information taken off campus is safely stored and that personal information is protected.

Handling of Sensitive Student Information

21. Access to Sensitive Student Information is restricted to the lead administrator or a person or persons authorized by the lead administrator to access such information defined in Definitions – Sensitive Student Information (page 6) below.
22. The lead administrator or designate will obtain parental consent (written, dated and signed) for the collection, use and disclosure of Sensitive Student Information, including psychiatric reports and family assessments, and will store these as highly confidential documents with restricted access.
23. Sensitive Student Information will only be disclosed or transferred in accordance with the law.
24. The lead administrator is responsible for ensuring that school initiated reports under section 14 of the Child, Family and Community Service Act are retained only for the purpose of child protection proceedings and that information is not disclosed to third parties or transferred to other schools. Such reports are strictly confidential and should only be stored where the lead administrator or designate can access them.

Use of Student Personal Information

The school authority may use an individual student's personal information for the following purposes, assuming that the school has disclosed such purposes to the individual student verbally or in writing on or before collecting the personal information:

POLICY AND PROCEDURES

25. To communicate with the student and/or the student's parent or legal guardian, to process a student's application, and to provide a student with the educational services and co-curricular programs provided by the school authority.
26. To enable the authority to operate its administrative function, including payment of fees and maintenance of ancillary school programs such as parent voluntary groups and fundraising activities.
27. To provide specialized services in areas of health, psychological or legal support, or as adjunct information in delivering educational services that are in the best interests of the student.

Access to and Disclosure of Student Records

28. A student and a parent/legal guardian of a student is permitted (unless restricted by a court order) to:
 - a. Examine the Student Record and Student File kept by a school authority pertaining to that student, while accompanied by the lead administrator or designate to interpret the records; and
 - b. Receive a copy of any student record upon request. The school authority reserves the right to recover the direct cost of copying records.
29. An entitled person may access and verify personal information in the Student Record and Student File pertaining to the particular student with appropriate notice to the school administration. Access will be provided during school hours.
30. Access to a Student Record or Student File will only be granted, upon assurance of confidentiality (with consent), to professionals who are planning for or delivering education, health, social or other support services to that student. Consent will be obtained in writing, listing the name and date of birth of the student, the name and signature of the parent/guardian, and the date of the request.
31. When applicable, graduating students will be provided with interim and/or final transcripts for Grades 10, 11 and 12 courses when graduating, and upon future request of the graduate. Copies will be mailed directly to institutions of higher learning or as requested by the graduate. The school authority reserves the right to assess a reasonable fee for transcript requests.
32. In the case of a request for personal student information from separated or divorced parents, the school authority will be guided by the legal custody agreement, a copy of which should be provided to the lead administrator. In cases where the lead administrator is unsure if the non-custodial parent is entitled to access personal student information, the school's legal counsel will be consulted for a recommendation.

Transfer of Student Records

33. On receipt of a request for student records from a school, a Board of Education, or an independent school authority from within British Columbia where the student is (or will be) enrolled, the school authority will transfer that student's PSR (including declared inclusions), the current Student Learning Plan (if any), and the current IEP (if any) to the requesting institution. The school authority will retain a copy of the PSR, indicating the school where the records have been sent and the date of the student record transfer.
34. If the requesting institution is outside British Columbia, a photocopy of the PSR will be sent (including declared inclusions), along with the current Student Learning Plan (if any), and the current IEP (if any).

POLICY AND PROCEDURES

35. Requests for a student's record from a public school require that the public school administration provide a copy of the PSR (including declared inclusions) and current Student Learning Plan (if applicable) and IEP (if applicable) to the independent school authority. The original PSR must be retained by the public school.
36. The school authority will only transfer sensitive, confidential information (e.g. psychiatric assessments) after dated and signed parent/guardian consent has been obtained.
37. The school authority will not transfer a record of a Section 14 Child, Family and Community Service Act report of alleged sexual or physical abuse made to a child protection social worker.
38. A summary of a former student's school progress may be provided to prospective employers, at the written request of a former student. The school authority reserves the right to assess a fee for this service.
39. A Student Record will be reviewed when a student transfers. The lead administrator will ensure that the documents listed as inclusions are still required inclusions (eg. not expired or rescinded) or still deemed to be relevant and important to the educational program of the student. Expired, rescinded, or irrelevant inclusions will be removed from the Student Record and the documents themselves will be shredded

Definitions

Elements of the Student Record:

- i. The Permanent Student Record (PSR), as defined in the Students Records Order (I 1/07):
 - a) Form 1704, PSB 048 (revised 1997) completed according to the Permanent Student Record Instructions that are effective at the time of completion; and
 - b) Student Progress Reports for the two most recent years or an official transcript of grades;
- ii. All documents listed as inclusions on Form 1704 (see 2.2 below);
- iii. A copy of the student's current Student Learning Plan, if any; and
- iv. A copy of the student's current Individual Education Plan (IEP), if any.

Permanent Student Record (Form 1704) Inclusions

The following inclusions must be listed on Form 1704, including document date, title and expiry date or date rescinded (if applicable), and copies of the documents listed must be filed with the PSR:

- i. Health Services information as indicated by the medical alert checkbox, such as diabetes, epilepsy, anaphylaxis producing allergies, and any other condition which may require emergency care;
- ii. Court orders as indicated by the legal alert checkbox;
- iii. Other legal documents, e.g. name change or immigration document;
- iv. Support services information (e.g. psychometric testing, speech and hearing tests, adjudication requirements for completing assessment activities)
- v. Current IEP and/or Case Management Plan (CMP) where applicable; and
- vi. Notification of a student being home schooled.

The following inclusions may be listed on PSR Form 1704, including document date, title and expiry date or date rescinded (if applicable) and if listed, copies of the documents must be filed with the PSR:

- i. Records of information which an educator deems relevant and important to the educational program of the student;
- ii. Award information; and

- iii. Standardized test scores (if deemed relevant and important to the educational program of the student).

If the above optional inclusions are NOT listed on PSR Form 1704, then they may be included in the Student File (see Student File section vii below).

Student File

Additional items must (see i below) or may (see ii – viii below) be included in the school’s student records as part of the Student File. These items include:

- i. Student eligibility information (required):
 - a. Legal name of child – verify the original and file a photocopy or scanned copy of birth certificate or similar legitimate identification document;
 - b. Official name(s) of parent(s) or guardian(s) with home and/or cell contact information; and
 - c. Verification that guardian is legally admitted to Canada and a resident of BC (see Appendix I, Form A, used to collect this information);
- ii. Care Card number;
- iii. Emergency contact numbers;
- iv. Previous Student Progress Reports (other than the two most recent years required in the PSR);
- v. Serious discipline reports (e.g. copies of letters to parents/guardians regarding discipline matters and corrective actions taken);
- vi. Reports of important meetings/discussions relating to the student; and
- vii. Standardized test scores, records of information which an educator deems relevant and important to the educational program of the student, and award information IF NOT listed as inclusions on the PSR (see Definitions – Permanent Student Record (Form 1704) Inclusions (page 5) above).

Sensitive Student Information.

This may include information which by its nature requires that school staff observe a high level of confidentiality. Examples include:

- i. Psychiatric reports;
- ii. Family assessments;
- iii. Referrals to or reports from school arranged counselling services; or
- iv. Record of a school-initiated report of alleged sexual or physical abuse made to a child protection social worker under section 14 of the Child, Family and Community Service Act.

Related Documents

- Independent School Act,
- Independent School Regulation
- Student Records Order (I 1/07)
- Personal Information Protection Act (PIPA)
- Office of the Inspector of Independent Schools
- FISA BC have collaborated in producing the Student Records Requirements and Best Practice Guidelines for Independent Schools, Ministry of Education, June 2012