



STUDENT RECORDS

Background

Board Policy 1: Mandate, Mission, Vision, Values, and Goals recognizes that Holy Spirit Catholic School Division ensures that our resources and efforts best serve the needs of our students. As such, student records are maintained in order to provide accurate, up to date background information for making important educational decisions such as grade promotion / retention, program assignment and assisting students who have special educational needs.

Student records are organized into two general categories: official student records and secondary student records. Both categories are governed by the Freedom of Information and Protection of Privacy Act (the FOIP Act), while the Official Student Record is governed also by the Alberta Student Record Regulation.

Both records may be kept in both physical or electronic forms; however, physical records should be converted to electronic form in a timely manner and destroyed once stored properly.

Employees may access official and secondary records for students currently enrolled at their school if it pertains to their duties. Similarly, employees who work at schools within the division may access any student's record if it pertains to their duties.

Definitions

Official Student Record

Records about students that are governed by both the Freedom of Information and Protection of Privacy Act (FOIP Act) and the Student Record Regulation. Examples of regulated student records include registration and demographic forms, copies of birth certificates, progress reports, attendance records, assessment and evaluation reports, Learner Support Plans, medical and safety plans, court orders, and suspension and expulsion letters (other than one-day suspension letters).

Secondary Student Record

Records about students that are governed by the FOIP Act alone and not the Student Record Regulation. Examples of supplemental student records include copies of sacramental records including baptismal certificates, letters and emails about students between employees or between employees and students' parents, employee notes, incident reports, and one-day suspension letters.

Student Record

Refers to both Official and Secondary student records, as well as any information contained within the SIS.

Student Document Systems

Refers to any local or hosted applications that would store student document images for the official or secondary student record.

Student Information System (SIS)

An application that contains information such as academic achievement, attendance, student services supports, student demographic, incident management and student schedules.

Records Retention Schedule

Is a timetable that identifies the official records of the division, the action that triggers the closure of a record, the length of time a record is retained before disposition and the final disposition of records (archives or destroy).

Procedures

1. Creation, Storage, and Maintenance of the Student Record:
 - 1.1 The Principal shall ensure that a student record shall be established for each student upon initial registration with the division and maintained for the exclusive purpose of accumulating information needed to provide for the educational welfare of the student.
 - 1.2 The Principal is responsible for ensuring the employees of the school maintain accurate and complete records for each student attending their school and for updating student records at least annually.
 - 1.3 An Official Student Record created for each student shall only contain information and documents required under the Alberta Student Record Regulation. In addition, the official student record will not include any information or documents that the Alberta Student Record Regulation prohibits.
 - 1.4 A Secondary Record for each student may contain documents allowed in the Alberta Record Regulation as a copy maintained by the division, as well as other documents deemed necessary by employees of the board.
 - 1.5 Storage of the Student Record shall be as follows:
 - 1.5.1 Student demographic information collected through registration will be stored within the divisional SIS. Student documents should be stored in the Official Student Record or the Secondary Record in accordance with the Student Record Regulation and the divisional document reference guide.
 - 1.5.2 School employees should make best efforts to ensure that documents entered into the appropriate storage in regards to the document category.
 - 1.5.3 Student documents may be kept on file in a physical format until it is digitized. Digitization should take place in a timely manner and physical documents should be destroyed within 30 days of digitization.
 - 1.5.4 In the case of historical documents dating back prior to digitization requirements, documents may be kept on hand until it has been

determined that paper copies have been scanned and stored properly in a digital format or the date for disposal is reached.

- 1.5.5 Student documents may be located within local servers within the district, hosted providers, or within The Provincial Approach to Student Information (PASI) program. Official Student Records will be stored within local servers and PASI, while secondary records are stored within local or hosted servers.
- 1.6 The student record is the property of the division which reserves the right to provide all or part of the student record as copies in accord with the School Act, FOIP, and the Administrative Procedures of the division.
- 1.7 Copies of the documents within the student record may be created provided to the parent / guardian or student (16 years or older) upon written request.

2 Student Record Access

- 2.1 Student records will be maintained in the strictest of confidence.
- 2.2 Parents and students shall be informed of their right to access student records and access, when requested, shall be provided at the earliest opportunity convenient to parents, students and staff.
- 2.3 All employees of the student's current school or employees of the division board office may access the student record without a formal request if it pertains to duties required of their position.
- 2.4 Access to the student record for individuals who are not employees of the board may be granted as following:
 - 2.4.1 The identity of individuals requesting access shall be verified by school personnel prior to access.
 - 2.4.2 The following persons will be permitted to view student documents:
 - 2.4.2.1 Student for whom the file was created provided that the student has attained the age of 16.
 - 2.4.2.2 Parent of the student for whom the file was created, unless a written request denying access to the parent has been received from a student who qualifies as an independent student.
 - 2.4.2.3 Person granted entitlement under an order pursuant to the Divorce Act (Canada).
 - 2.4.2.4 Other persons upon receipt of the written permission of the parent if the student is less than 16 years of age and/or the student if the student is 16 years of age or older.
 - 2.4.2.5 Officers of a court under appropriate court order.

- 2.4.2.6 Formal requests for student documents by persons other than the legal guardian or student (if 16 years of age or older), shall be recorded in accordance with the FOIP Act.
 - 2.4.3 Requests from parents/guardians or currently enrolled students, not in the form of an official FOIP request, should be handled as follows:
 - 2.4.3.1 Students or guardians who are 13 years of age or older may be given access to PASI through the approved PASI access procedures (e.g., MyPass) for access to the official student record.
 - 2.4.3.2 Depending on the nature of the documents, Secondary Record documents may be provided to parents/guardians or students upon written request at the discretion of the Department Head or designate.
 - 2.4.3.3 Persons who are permitted to view the student record may be provided with an explanation of its contents by a qualified individual.
 - 2.4.3.4 When a file contains documents which relate to a test, a test result or an evaluation by an employee of the Holy Spirit Catholic School Division who has relevant recognized expertise or training, arrangements are to be made as soon as practicable for the availability of the employee or a suitable alternative for the purpose of providing an explanation and interpretation of the documents.
 - 2.4.3.5 When a file contains a document prepared by a person who is not an employee of the Holy Spirit Catholic School Division, the person who wishes to review the files is to be referred to the originator of the document for an explanation and interpretation of its contents.
- 2.5 Upon students transferring schools within the division or ending the enrollment with any school within the division:
 - 2.5.1 The Official Student Record will be uploaded to PASI to allow access to other schools, Alberta school districts, and schools outside Alberta access.
 - 2.5.2 Schools outside of Alberta may access the Official Student Record via the approved PASI access procedures. PASI should be reviewed on a regular basis by the Principal to ensure requests for student documents are reviewed and approved or denied.

3. Retention and Disposal

- 3.1 Disposal of documents should be reviewed by the employees of the student's current school on an annual basis. PASI should also be reviewed by the Principal to ensure that documents are destroyed when they meet their disposal

date in accordance with the PASI retention schedule.

- 3.2 Secondary student documents will be maintained in a locally hosted server until the time for disposal indicated in the Holy Spirit Records Retention Schedule is reached.
- 3.3 Official Student Record documents, if not already uploaded to PASI, will be uploaded to PASI when the student is no longer enrolled within the division.

4. Appeals

- 4.1 All appeals should be submitted in a formal written request and stored within the student's secondary record.
- 4.2 Parents and students have the right to appeal any decisions that would deny them access to appropriate student records, or to appeal the accuracy or incompleteness of a school record.
- 4.3 Changes for changes to the student record after a student is no longer enrolled with the division must be submitted via a formal written request and approved according to FOIP procedures. Requests should be stored within the student's Secondary Record.
- 4.4 Responses to appeal requests will be made in accordance with the following guidelines:
 - 4.4.1 Except for reports prepared by Board personnel or by outside agencies, the Principal is authorized to rule on requests for adjustment and to make appropriate changes in the file.
 - 4.4.2 In the case of reports prepared by Board personnel, the Principal will obtain a decision from the originator of the document or, if unavailable, from the Superintendent.
 - 4.4.3 In the case of a report prepared by agencies or person not employed by the Board, the Principal (in consultation with the Superintendent) may remove the report in its entirety if it is determined that the information in the report is of a sensitive nature whose disclosure, in the judgment of the Principal, would clearly be injurious to the student. However, if in the opinion of the Superintendent, the release of the information would be in the public interest, the information shall be included in the student record file.
 - 4.4.4 If the request is not approved by the Principal, the parent and / or student is to be informed of the right of appeal to the Superintendent.

References **Student Record Regulation 226/2006 – amendments up to & including Alberta Regulation 229/2009**
 Section 56, Education Act
 Freedom of Information and Protection of Privacy Act
 Divorce Act (R.S.C., 1985, c.3 (2nd Supp))