

Purpose

Student records must be kept in compliance with AP185, the Education Act and the Student Record Regulation. Records are to be kept up to date and secure whether in paper or digital format. This Administrative Procedure outlines, for School Administration and staff, the specific requirements and responsibilities relating to student records.

Background

Every student will have records. Rocky View Schools (RVS) is responsible to collect and maintain all information affecting the decisions made about the education of the student or child.

Definitions

- Custodian:** The individual, usually the Division's Records Management Assistant or a Principal, managing the information in accordance with the decisions made by the Owner.
- Owner:** The RVS employee who has the responsibility and accountability for ensuring the existence, maintenance, security (storing in an RVS secure location whether digital or paper) and disposition of the master record. All records have an identifiable Owner acting on behalf of RVS.
- Record:** Any paper, microform, electronic or physical object regarded as an official record, a document upon which a decision is based, where information is stored and made/or acquired by an employee of RVS. These records are subject to the FOIP Act.
- User:** All RVS employees and any person granted access to information or who generates or acquires information on behalf of RVS.
- PASI:** The Provincial Approach to Student Information database and application maintained by Alberta Education.
- CUM File:** Short for Student Cumulative file this documentation consists of non-sensitive data related to a students' education. See the CUM File Handbook for specific file types that fall in this category.
- Student Supplemental File:** Consists of documentation that is not part of the CUM File but is needed to provide the education of the student. May include documentation outlined in 4.2. See the Student CUM File Handbook for specific file types that fall into this category.

Procedures and/or Principals

1. Information Collection

- 1.1. All information collected must be done in accordance with the FOIP Act, including reference to the specific use and retention of the information collected. Information is only to be collected in the Student Record that directly relates to, and is necessary for, an operating program or

activity of the School Division. Reference AP182 and the FOIP act for specific collection requirements (including notice outlining the purpose of collection).

2. Record Maintenance

- 2.1. The Associate Superintendent of Learning Services or designate is responsible for quality assurance and consistency in divisional management of student records.
- 2.2. The Principal, as the Custodian, shall ensure that the student record is compiled, handled and retained in accordance with the above legislation and division procedures and processes.
- 2.3. It is the responsibility of the Principal to ensure staff are aware of all requirements.
- 2.4. The Principal, or designate, shall ensure that information contained within a students' record is updated annually.
- 2.5. A student record **must contain all information affecting the decisions made about the education of the student** that is collected or under the maintenance of Rocky View Schools and as outlined in the Student Record Regulation, section 2(1).
 - 2.5.1. Notwithstanding, the Superintendent/designate may exclude from a student record a test instrument or any part of it, but where there is an appeal before the Board in respect of a test, a test result or an evaluation of a student in respect of a test or a test result, the persons referred to in section 42(4) of the Act may review a test instrument as if it were part of the student record.

3. Confidentiality and Access Allowances

- 3.1. All information in the student records shall be treated as confidential except where disclosure is permitted under the Education Act, Student Record Regulation, FOIP or Privacy Legislation.
- 3.2. AP180 outlines the process for requesting and providing access to a student record. Parents/Guardians must also complete an official request for access and/or copies of records as outlined in AP180. This is to protect both the student and the Division.
- 3.3. Division employees are only to be granted access to the student records needed and as outlined within their job description. Personal Information Banks (PIB's) are to be updated to reflect who has access to specific information banks (see AP182 for additional information on PIB's).

4. Appeal or Exception Administration

- 4.1. Under section 42(4) of the Education Act, an individual may appeal to the Board a decision of an employee respecting access to or accuracy or completeness of the student record within a reasonable time from the date that the parent/guardian or student was informed of the decision.
- 4.2. The Superintendent/designate may include in a students' record any information referred to below, if, in the Superintendent's opinion, the information would clearly be injurious to the student if disclosed but where inclusion of the information in the student record would, in the Superintendent's opinion, be (a) In the public interest; or (b) necessary to ensure the safety of students and staff.
 - 4.2.1. Notes and observations prepared by and for the exclusive use of a teacher, teacher's assistant, counsellor or Principal, and that are not used in program placement decisions;

- 4.2.2. A report or an investigation record relating to the student under the *Child, Youth and Family Enhancement Act*; or
- 4.2.3. Counselling records relating to the student that is, or may be personal, sensitive or embarrassing to the student, unless section 8 applies; or
- 4.2.4. Any information that identifies a student as a young person as defined in the *Youth Criminal Justice Act* and all information relating to that student in that capacity.

5. File Retention, Transfer and Destruction Procedures

- 5.1. Student records will be retained and destroyed as outlined in Administrative Procedure AP185 for records retention.
- 5.2. Student records consist of two parts: the CUM File, and Supplemental student records.
- 5.3. All student records to be transferred within the province are to be requested and transferred electronically through PASI. All requests for student files from outside the province are to be completed by the requesting party through Alberta Student Link or MyPass (for students and their parents/guardians).
- 5.4. Transitory Student records (includes duplicates, printed copies or non-retained documents) are to be disposed of in accordance with AP185. Only the master copy is to be retained.
- 5.5. Papers containing personal information, or digital documents, must be disposed of to ensure to the best of their ability that a breach of personal information does not occur (AP182).

Date Issued: August 2017

Version: II

References

- i. External Legislation:
 - [Education Act](#)
 - [Student Record Regulation 97/2019](#)
 - Child, Youth and Family Enhancement Act
 - Freedom of Information and Protection of Privacy Act
 - Public Health Act
 - Social Development Act
 - Vital Statistics Act
 - Youth Justice Act
 - Section 23 Canadian Charter of Rights and Freedoms
 - Youth Criminal Justice Act
- ii. RVS Policies and Procedures:
 - AP180 – FOIP Requests for Access to Information or Correction of Personal Information
 - AP182 – Protection of Privacy
 - AP185 – Records Management

- iii. RVS Forms:
 - N/A
- iv. RVS Handbooks and Manuals
 - [Handbook](#)
 - [Student Cumulative File Digitalization Project Resources](#)
- v. Other
 - [Alberta Student Link](#)
 - [MyPass](#)
 - [Alberta Education – Student Records](#)
- vi. Contact/Branch
 - busops@rockyview.ab.ca