

Background

A student file is created when a student registers at a school that is recognized by Alberta Education. Cumulative records and other student school records pertaining to a student are the sole property of Pembina Hills School Division. It should be noted that at the writing of this document, the Division is in a transition state. All new records should be created in a digital format, but legacy documents may still exist in paper format. This Administrative Procedure focuses primarily on the end state of the transition (full digital) but may have references to paper processes for the handling of older records.

An official cumulative record will be maintained in a digital format for each student in the Division. The cumulative record is then stored in the Division's digital system of record; currently DocuShare. Each file will be reviewed annually and updated as necessary in order to provide an accurate record of the student's education. All information in student records shall be treated as confidential and accessible only to the student and their parents/guardians and school division staff/contractors who are directly involved with the student's program. In addition to the right of access, the student and/or their parent(s) have a right to a professional interpretation of the data contained in an official record, if such is required. No teacher or school system employee shall give information from a child's record to anyone outside of the school staff unless they have first obtained permission of the Principal or designate. Information pertaining to marks and attendance may be made available to prospective employers or Alberta Education personnel if permission is granted by the student's parents/guardian (if the student is under 16 years of age) or the student or the parent/guardian if the student is 16 years of age or older, or the student if the student is 18 years of age. Student marks shall be forwarded to Alberta Education as required.

The student file remains in the digital system of record *Regulation* for what can and can not be included in the Student Cumulative (CUM) File.

Procedure

1. Student Record File Transfers

According to the *Student Record Regulation*:

- 8 (1) If a student or child transfers from a school in Alberta to another school in Alberta:
 - a) the board or the early childhood services program private operator from which the student or child transfers may disclose the student record for the student or child containing the information referred to in section 2(1) and
 - b) the board or the early childhood services program private operator to which the student or child transfers may collect the student record for the student or child containing the information referred to in section 2(1) and (4).

- (2) If the student record for a student or child who transfers from a school in Alberta to another school in Alberta is not in electronic form, the board or the early childhood services program private operator from which the student or child transfers must, on receipt of a written request from the school to which the student or child transfers,

send the original student record for the student or child containing the information referred to in section 2(1) and (4) to that school.

- (3) If a student or child transfers to a school outside Alberta, the board or the early childhood services program private operator from which the student or child transfers must, on receipt of a written request from the school to which the student or child transfers, send a copy of the student record for the student or child containing the information referred to in section 2(1) and (4) to that school.
- 1.1 When the student is transferring to another school, outside our Division, within Alberta, the compatible file types in the student records shall be uploaded to PASI. If this is not accessible to the receiving school, a copy shall be forwarded (via secure internet transmission) to the receiving school upon obtaining a written request from the receiving school. When sending Student Records within Alberta but outside our Division please make certain that:
 - The request for the file is authorized and you retain the authorization form. Date the student record request with the date the record was sent. All request forms should be stored in the digital system of record in the Students 'Non-PASI' folder (see below).
 - 1.2 When sending Student Records outside of Alberta please make certain that:
 - The request for the file is authorized and you retain the authorization form (stored in the digital system of record as above).
 - Only copies of pertinent information from the CUM file are sent via secure internet transmission (the original documents remain in the now *inactive* CUM file in the Digital System of Record. If the record has been digitized, any paper copies should be destroyed (shredded). If the school has the capacity to scan outstanding paper records, they should do so and destroy the paper copies. If the volume of paper records is beyond the capacity of the school to manage, they should forward those records to Student Services as per AP 30-70.
 - 1.3 When sending Student Records within the Division:
 - If the record still exists in paper form, it should be scanned and filed in the Digital System Record (skip this step if the documents are already stored in the Digital System Record).
 - Once the file has been successfully scanned, it must be disposed of (shredded).
 - Once in a digital format, the file should be moved to the 'Internal Division Student Transfer' folder.
 - Email the administrative assistant who requested the file that it is being delivered to them.
 - The administrative assistant for the requesting school will then be responsible for moving the file into the appropriate folder structure.
 - 1.4 When a Student Cumulative File/Record becomes inactive, please make certain that:
 - If the file is still in a paper format:
 - The student name and birth date are clearly marked on the outside of the file.
 - An email is sent to Student Services (roedservadminassistantsss@phrd.ab.ca) indicating that a record is being delivered through interoffice courier or via secure internet transmission (DocuShare).

- Ensure that the mail courier knows it is a CUM File/Record that is being delivered to Student Services, if it is being delivered via interoffice mail.
 - If the file is in a digital format it will be transferred into the folder '!'-Exited Students' (A copy of this folder exists for each school for students who have left the Division). Files in this folder become subject to the Division's data retention policy.
- 1.5 Records should be transmitted only under the most secure conditions (digitally if at ALL possible).
- A student record shall not include:
 - notes and observations that are prepared by and for the exclusive use of a teacher or Principal, and that are not used in program placement decisions.
 - any information relating to a report or an investigation under the *Child, Youth and Family Enhancement Act*.
 - information of a sensitive nature, the disclosure of which, in the opinion of the Principal would clearly be injurious to the student, but if, in the opinion of the Principal the release of the information would be in the public interest the information shall be included in the student record. If there are any concerns, contact the Director of Student Services.
 - Suspension or expulsion information. Information about any suspension of more than one day or expulsion relating to the student or the student's rights pursuant to the *Student Record Regulation*, which must be recorded and retained on the student record for a minimum period of one year and a maximum period of three years following the date of the suspension or expulsion. After this period, the information must be removed from the student's record.
2. Student Services Protocol for Student Record Requests:
- 2.1 Determine if the student record is at the school or has been archived.
 - 2.2 If the student record is still at the school, the request should be sent to the school and the school will forward the student record to the requesting school.
 - 2.3 After a student file request is received, the student record is located.
 - 2.4 The request is reviewed and determined what is to be forwarded based on the request.
 - 2.5 If this file is still in a paper format, it will be digitized and the paper copy disposed of.
 - 2.6 The information can then be forwarded to the requesting party as per the processes listed above.
3. Transferring Inactive Student Records to Student Services (for legacy paper documents ONLY)
- 3.1 Schools are to forward the student records for storage and/or destruction to Student Services one or two years after the student has graduated, recording the student CUM files on the Excel spreadsheet (Form 3-53-B). Schools forward the files to Student Services, using Form 3-51-A Document Destruction Box Inventory and Form 3-53-B Inventory Sheet for CUM Files, signed by the Administrative Assistant and Principal. The original copy of Forms 3-51-A and 3-53-B are to be sent to Student Services by Interoffice Mail before the boxes of CUM files are sent. Ensure a copy is kept for your records. Also, include records of students who have moved to another school or school division or are deceased. Marks and qualified attendance information will be released only after permission has been obtained from the Superintendent or designate.

- 3.2 Ensure that the file is labeled on the outside with the birth date in the format - yyyy-mm-dd. (E.g.1986-10-31)
 - 3.3 Include the name on the outside of the student's file in the form of last name first, first name second, middle name then alias or other family last names in brackets. (E.g. Jones, Heather Mary (Smith))
 - 3.4 Schools are to place the student records in **Alphabetical Order by birth year**. The school is to provide a detailed summary list of all student records being sent over with student names and birth dates.
 - 3.5 Place a list of the student names and birth dates in the inside of each box using Form 3-53-B template.
 - 3.6 Email Student Services the number of boxes ready for pick up.
 - 3.7 Email the Excel Spreadsheet (Form 3-53-B) to Student Services in order that the student CUM files can be imported to the Records Management Database.
 - 3.8 Student Services will then reply with a scheduled pick up date.
 - 3.9 When the courier arrives to transport the boxes, ensure that the boxes are not heavier than 30 pounds.
 - 3.10 After the student files have been delivered to Student Services, any inquiries your school receives regarding information from the inactive cumulative files/records should be forwarded to Student Services.
4. Student Services actions upon receipt of the transferred legacy paper student records:
 - 4.1 The files must be inventoried by entering them into the Records Inventory database before they are filed into existing boxes. Each student record is to be entered as a separate record. Once the records are forwarded, they are archived by entering them into the database and placed into storage until the records meet their retention.
 - 4.2 As the records are being entered into the database, the box numbers must be entered into the student's record in the database.
 - 4.3 New boxes are created as necessary. Leave room in each box to be able to add files later on.

5. Retention and Disposition

According to the *Student Record Regulation*:

- 4(1) Subject to subsection (2), a board shall keep a student record containing the information referred to in section 2(1) and (2) for 7 years after the student ceases to attend a school operated by the board or until the student record has been forwarded to another school in accordance with section 8(1).
 - (2) If a student transfers from a school in Alberta to a school outside Alberta, the board that operates the school from which the student transfers shall keep the student record containing the information referred to in section 2(1) and (3) for 7 years after the date the student could be expected to have completed grade 12 if the student had not transferred from the school.
 - (3) Notwithstanding subsections (1) and (2), a board may choose to keep a student record for longer than 7 years if a longer retention period is authorized by a resolution of the board.
- 5.1 A board shall dispose of or destroy student records that are no longer required to be kept under section 3.
 - 5.2 Student records shall be disposed of or destroyed in a manner that maintains the confidentiality of the information in the record.

- 5.3 A board shall dispose of information referred to in section 2(4) relating to a student in the same manner as student records are to be disposed of under subsection (2).
- 5.4 The student record will be disposed of 7 years following the year of graduation from grade 12.

6. Electronic Student Records

- 6.1 Student electronic records shall be managed in the same way that paper Student records are managed.
- 6.2 Electronic Student Records file structure:

School Name → Student Record Files - <School Name> (under the School Name Folder)

!-Exited Students (container for students who have left the Division from the school)

List of folders by Alphabet (A, B, C,...) or letter range (A-C, D-F, ...)

Student Record Files (placed in folder above account to first letter of last name)

Title: Last Name, First Name, ASN

Description: Expected year of graduation

Assessments (Professional and external supports, case conference minutes, IPP's, etc.)

Format: Date of Report, Last Name, First Name, Report name/type

Ex. 20200917 Smith, Joe, PsyRpt.pdf

Summary: ASN, PASI Document Type

IPP listed as a folder under Assessments

Registrations (Birth certificate, registration, immigration papers, etc.)

Format: Timestamp, Date of Report, Last Name, First Name, Report Name/Type

Ex. 20200917 Smith, Joe, ABBrthCrt.pdf

Summary: ASN, PASI Document Type

School Reports (Report Cards, Attendance letters, CCAT, MMPI, BAS, etc.)

Format: Same as Registrations Documents (above)

Discipline (Suspensions, Expulsion hearings)

Format: Same as Assessment Documents (above)

Non-PASI (Student Documents not covered above)

Format: Same as Assessment Documents (above)

- 6.3 All student injury reports should be stored under the Occupational Health and Safety area in the Digital System of Record which will contain folders identified by each School's name.

Reference

[Education Act](#)

[Freedom of Information and Protection of Privacy Act](#)

[Student Record Regulation](#)

[Form 3-51-A Document Destruction Box Inventory for Storage and/or Destruction](#)

[Form 3-53-B Inventory Sheet for Student CUM Files – Excel spreadsheet](#)

[Form 3-53-C Authorization to Release Student Record Information](#)

[Form 3-53-D Routine Disclosure Request Form](#)