

Living Sky School Division No. 202

Administrative Procedure (AP) Manual



Procedure Name: Records Retention and Disposal

Procedure Type:	Business Administration	Implementation Date:	FEB 25, 2009
Procedure Number:	7.08	Last Revision Date:	MAY 25, 2026
AP Owner:	Privacy Officer	Last Review Date:	MAY 25, 2026
Legal Reference(s):	<i>Local Authority Freedom of Information and Protection of Privacy Act, 1990</i> <i>The Education Act, 1995, s. 51, 85, 231</i> <i>The Local Government Election Act, s. 112</i> <i>The Archives Act, 2004</i>		

Background

As a local authority, Living Sky School Division (LSKYSD) collects and uses personal information of students, families, employees, trustees, volunteers, contractors, and third parties in order to perform its duties as outlined by *The Education Act, 1995*. LSKYSD recognizes its duty to protect the personal information it collects from breaches in accordance with the *Local Authority Freedom of Information and Protection of Privacy Act, 1990* (LAFOIP). LSKYSD also recognizes its obligations with regard to the right of individuals and the public to access information, as well as its obligations to protect information from unauthorized access under LAFOIP.

LSKYSD affirms the “Data Minimization Principle” that the Saskatchewan Office of the Information and Privacy Commissioner (OIPC) indicates as underlying Part IV of LAFOIP regarding the collection, use, storage, disclosure, retention, and disposal of personal information.

Scope

This procedure applies to the retention, storage, and disposal of personal information in the possession of LSKYSD and its employees, trustees, volunteers, and contractors. Personal information may belong to students, families, employees, trustees, volunteers, contractors, or third parties.

Definitions

The **Data Minimization Principle** states that an organization should always store the least amount of personal information necessary for the purpose in which it was intended and should securely dispose of personal information when it is no longer necessary for that purpose.

The **Double Lock Rule** describes storage of records behind two systems of security. Physical records are secured by two sets of locks, eg: a locked cabinet in a locked room. Electronic records are secured by two sets of electronic keys, eg: a password-protected information system accessed on a password-protected computer.

Individuals means individual persons, including students, parent/guardians, employees, trustees, volunteers, contractors.

Personally Identifiable Information (PII) or **personal information** is information about an individual recorded in any form. PII is information that is personal to the individual as opposed to information generated as part of the work they do. A complete list is contained in section 23 of the *Local Authority Freedom of Information and Protection of Privacy Act, 1990* (LAFOIP Act).



Records are information about individuals that may contain personal information. Records may be physical or electronic. Records may be accessed by individuals or the public under *LAFOIP* unless otherwise exempted.

Transitory records are temporary records with short-term usefulness that are not required to be retained in files. Examples include sticky notes, phone messages, and drafts.

Roles & Responsibilities

Director of Education

- acts as the head of LSKYSD for the purposes of compliance with *LAFOIP*
- designates day-to-day duties to the Privacy Officer

Privacy Officer

- advises on questions of record storage and disposal
- develops procedures and protocols regarding record storage and disposal
- facilitates education and training regarding record storage and disposal

Principals

- ensure compliance with procedures and protocols regarding record storage and disposal at their schools

Specialists

- ensure compliance with procedures and protocols regarding record storage and disposal in their services areas

Employees, Trustees, Volunteers, and Contractors

- comply with procedures and protocols regarding record storage and disposal in their daily work

Procedures

General

1. LSKYSD shall collect and maintain records in the course of operations.
 - a. All records retained and disposed of by LSKYSD are the property of LSKYSD.
 - b. LSKYSD holds the sole authority to direct how its records are stored, protected, and disposed of, with reference to the *LAFOIP Act* and other statutes.
 - c. LSKYSD primarily refers to the Saskatchewan School Boards Association (SSBA) as the interpreter of privacy statutes and regulations, namely
 - i. the *Privacy and Access in Saskatchewan Schools* guides,
 - ii. the *Records Retention and Disposal Guide for Saskatchewan School Divisions*, and
 - iii. legal services provided by the SSBA.
2. Responsibility for safeguarding records sits with the positions that maintain where the records are held, subject to LSKYSD policies and procedures.
3. Transitory records shall not be retained and shall be securely disposed of as soon as they are no longer current.
4. Retention and disposal of records shall be in accordance with statutes and regulations of
 - a. *Local Authority Freedom of Information and Protection of Privacy Act, 1990*



- b. *The Education Act, 1995*
- c. *The Local Government Election Act,*
- d. *The Archives Act, 2004*

- 5. The duration of retention of records shall follow the *Records Retention and Disposal Guide for Saskatchewan School Divisions*.

Storage of Records

- 6. All records containing personal information shall be stored securely to reasonably restrict access to only individuals requiring access to personal information in order to perform their duties.
 - a. For physical records, access shall be managed through physical means such as door locks and retaining records in offices.
 - b. For electronic records, access shall be managed through permissions and settings.
- 7. When not in use, records containing personal information shall be secured.
 - a. If stored in a cabinet, the cabinet is locked when not in use.
 - b. If stored in a secure room, the room is locked when not in use.
 - c. If stored as an electronic file, the computer is locked when not in use.
 - d. If stored in a database, individuals have logged out when not accessing the database.
- 8. For records of a particularly sensitive nature, where there is a higher risk of individual harm if breached, records shall be stored using the *double lock rule*.

Transfer of Records

- 9. Transfer of cumulative records shall follow the Cumulative Record Requests and Transfers Protocol (*in development*).
- 10. Other records may be transferred to other authorities after consultation with the Privacy Officer or according to internal protocols.

Disposal of Records

- 11. The School Records Retention and Disposal protocol detail end-of-year disposal or transfer to other storage of records, including documenting the disposal.
- 12. Records shall be disposed of securely, either by shredding/deleting the record or contracting a secure disposal service.

Appendices

School Records Retention and Disposal Protocol (*internal document*)

Related

- 4.34 Student Records
- 5.45 Employee Records
- 5.38 Records Collection, Access, and Privacy



[Information and Privacy Commissioner Guide to The Local Authority Freedom of Information and Protection of Privacy Act](#) (*Office of the Information and Privacy Commissioner documents*)

Records Retention and Disposal Guide for Saskatchewan School Divisions (*Saskatchewan School Boards Association document*)