



Approved: January 11, 2021

**Selkirk Montessori School
Student Records Requirements Policy**

Purpose:

The purpose of this document is to define policy and to determine procedures for the collection of student information and its storage, use, disclosure, transfer and protection. Selkirk Montessori is committed to ensuring that student records are handled in accordance with all legal requirements.

Policy Statements:

The following policy statements are provided to inform all parties who collect, store, use, disclose, transfer, and protect student information. Selkirk Montessori will:

- Ensure that the Head of School or their delegate, under the advisement of the Privacy Officer, is responsible for the establishment, security and maintenance of the Student Record and Student File (as defined in this policy) for each student registered in the school according to the procedures defined in this policy.
- Only collect, use, or disclose personal information with the consent of the legal guardian as authorized on the registration form, unless otherwise authorized under PIPA.
- Upon collecting personal information, disclose to the individual student or guardian, verbally or in writing, the purposes for the collection of personal information.
- 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 or are otherwise permitted under PIPA.
- Secure Student Records and Student Files with access restricted to those individuals who, by the nature of their work are required to have access to the information.
- Provide access to personal information about an individual student to the individual student (if capable of exercising PIPA rights), and to a parent or legal guardian of the individual student during school hours and under the supervision of the Head of School or their delegate.

- Subject to legal requirements, ensure that personal information will be retained only for the period required to fulfill the purpose for which it was collected.
- Inform parents that concerns, complaints, and questions about personal information handling policies and practices of the Head of School or their delegate may be directed to the school's Privacy Officer by calling the school office.

Definitions and Student Record Components:

Elements of the Student Record:

The Permanent Student Record (PSR), as defined in the Students Records Order (I 1/07): Student Records Requirements and Best Practices Policy/October 2013.

- Form 1704, PSB 048 (revised 1997) completed according to the Permanent Student Record Instructions that are effective at the time of completion.
- Student Final Progress Reports for the two most recent years.
- All documents listed as inclusions on Form 1704.

Permanent Student Record (Form 1704) Inclusions:

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

- Health services information as indicated by the medical alert checkbox (see Form 1704) such as diabetes, epilepsy, anaphylaxis producing allergies, blood clotting disorders, and serious heart conditions: any other condition which may require emergency care (after consultation with health care professional); situations/conditions which may interfere with student performance, health, or behavior (hearing aids, prescribed medication, cerebral palsy, cystic fibrosis, etc.); and severe allergies in K-3 students to school based allergens
- Court orders as indicated by the legal alert checkbox (see Form 1704) or their rescinding date if applicable.
- Other legal documents (e.g. name change or immigration document).
- Support services information (e.g. psychometric testing, speech, and hearing tests, adjudication requirements for completing assessment activities).
- Individual Education Plans (IEP's) or Case Management Plans (CMP's).

- Notification of student being homeschooled:

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:

- Records of information which an educator deems relevant and important to the educational program of the student, including but not limited to:
 - Serious discipline reports (e.g. copies of letters to parents/guardians regarding discipline matters and corrective actions taken).
 - Copies of notes from important meetings/discussions relating to the student.
 - Standardized test scores, records of information which an educator deems relevant and important to the educational program of the student, and award information.
 - Learning Support Plans (LSP).
- If the above optional documents are NOT listed as inclusions on PSR Form 1704, then they may be included in the Student File.

Student File Additional items must or may be included in the school's student records as part of the Student File. These items include:

- Student eligibility information (required):
 - Legal name of child – verify the original and file a photocopy or scanned copy of birth certificate or similar legitimate identification document.
 - Official name(s) of parent(s) or guardian(s) with home and work contact information.
 - Verification that parent/guardian is legally admitted to Canada and a resident of BC (see Appendix I, Form A, used to collect this information).
- Care Card number.
- Emergency contact numbers.
- Doctor's name and contact information.

- Previous Student Progress Reports (other than the two most recent years required in the PSR) previous student progress reports (other than the two most recent years required in the PSR).
- Serious student discipline reports (e.g., copies of letters to parents/guardians regarding discipline matters and corrective actions taken).
- Reports of important meetings/discussions relating to the student.

Sensitive Student Information

Sensitive Student Information will be kept in a secure protected file location by the Head of School or their delegate. This may include information which by its nature requires that school staff observe a high level of confidentiality. Examples include:

- Psychiatric reports.
- Family assessments.
- Referrals to or reports from school arranged counselling services; or
- 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.

Procedures:

The Head of School or their delegate will be responsible for overseeing that the following occurs:

- Updating the PSR Form 1704 as information changes and the student progresses through the system.
- Ensuring that any 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
- Ensuring that the Head of School or their delegate takes necessary precautions to safeguard against deprecated or obsolete forms of storage. The electronic storage of PSRs and other personal information requires the Head of School or their delegate to have an adequate backup plan and recovery strategy for potential hardware failure and database corruption.

Student Record and Student File Retention:

- Student Records – Active Students:
 - Student Records are locked in fireproof cabinets. 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.
 - The Head of School or their delegate protects personal information from unauthorized access, collection, use, disclosure, copying, modification, or disposal, or similar risks.
 - The Head of School or their delegate will periodically review Student Records to ensure that the information is current and complies with legal requirements. Required inclusions must be listed on the PSR.
- Student Records – Inactive Students:
 - The PSR will be retained until another school requests the PSR for 55 years after a student has withdrawn and not enrolled in another K-12 school or graduated from the school. It will be destroyed after 55 years.
 - 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 school authority or designate.
- Student Records – Transferred Students:
 - The PSR will be sent to the receiving school up on records request and the PSR copy will be destroyed after 55 years.
 - 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 school authority or designate.
- Student Files – Active Students:
 - Student Files are locked in cabinets in each school. 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.
 - The Head of School or their delegate protects personal information from unauthorized access, collection, use, disclosure, copying, modification, or disposal, or similar risks.

- The Head of School or their delegate 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:
 - The Head of School or their delegate archives Student Files for 20 years after the student has withdrawn and not enrolled in another K-12 school, or graduated from the school.
 - 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 Head of School or their delegate.
 - The Head of School or their delegate is responsible for determining the relevancy of the contents in Student Records before being archived.
- Student Files – Transferred Students:
 - The Head of School or their delegate archives will shred forms and reports once a student's file has been transferred to another school.
 - The Head of School or their delegate is responsible for determining the relevancy of the contents in Student Records before being shredded.
- Security of Student Information Off Campus:

The Head of School or their delegate is responsible for ensuring that personal information taken off campus is safely stored, and that personal information is protected.

Handling of Sensitive Student Information:

- Access to Sensitive Student Information is restricted to the Head of School or their delegate, for the purposes of supporting the child.
- If a parent chooses to complete testing of their child privately then the discretion to distribute results remain with them. Upon receipt of this documentation, it will be requested that parents give permission to copy for the student's PSR. Permission to copy will be stated on the document itself or in writing and attached to the document. If a parent does not want it retained for the file, instead the school authority will have them sign a form indicating assessment or documents can be presented by request.

- Originals will be placed in Student Records with a copy retained by Special Education in a locked file, if frequently referenced. The Head of School or their delegate 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.
- The original document will remain in a secure protected file location with the Head of School or their delegate. Sensitive Student Information will only be disclosed or transferred in accordance with the law. The Head of School or their delegate 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 Head of School or their delegate can access them.

Use of Student Personal Information:

The Head of School or their delegate may use an individual student's personal information for the following purposes if the school has disclosed such purposes to the individual student verbally or in writing on or before collecting the personal information:

- 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 Head of School or their delegate.
- To enable the Head of School or their delegate to operate its administrative function, including payment of fees and maintenance of ancillary school programs such as parent voluntary groups and fundraising activities.
- 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

Please refer to the Access and Disclosure of Student Information Policy.

- **Access to a Student Record or Student File will be granted, upon assurance of confidentiality, to professionals who are planning for or delivering education, health, social or other support services to that student.**

- In the case of a request for personal student information from separated or divorced parents, the Head of School or their delegate will be guided by the legal custody agreement, a copy of which should be provided to the Executive Director. In cases where the Head of School or their delegate 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:

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 Head of School or their delegate will transfer that student's PSR including declared inclusions. The School will retain a copy of the PSR, indicating the school where the records have been sent and the date of the student record transfer for 55 years.

If the requesting institution is outside British Columbia, a photocopy of the PSR will be sent including declared inclusions.

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 to the independent school authority. The original PSR must be retained by the public school.

- The Head of School or their delegate will only transfer sensitive, confidential information (e.g. psychiatric assessments) after dated and signed parent/guardian consent has been obtained.
- The Head of School or their delegate 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.
- A Student Record will be reviewed when a student transfers to another school. The Head of School or their delegate will ensure that the documents listed as inclusions are still required inclusions (e.g., 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.
- The student file will be shredded upon transfer, other than the PR Card and the related progress reports and listed inclusions, which will be stored for 55 years.

References:

Permanent Student Record Instructions:

<https://www2.gov.bc.ca/assets/gov/education/administration/legislation-policy/legislation/schoollaw/e/m082-09.pdf>

Students Records Order (11/07): Student Records Requirements and Best Practices Policy/October 2013:

<https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:82a6933e-6670-4759-a89d-fac3648341ee>

Child, Family and Community Service Act

APPENDIX A – AUTHORIZATION TO SHARE INFORMATION

Approved

APPENDIX A – AUTHORIZATION TO SHARE INFORMATION



Authorization to Share Information

Name of Student: _____ Date of Birth: _____

Selkirk Montessori School is requesting that you complete the following:

Section A:

I hereby authorize Selkirk Montessori School to **request/and release** records and information with:

1. _____
2. _____
3. _____
4. _____

This information will assist Selkirk Montessori School in developing an appropriate educational program. The information requested is considered confidential and will be treated accordingly.

Parent/Guardian Signature(s): _____
Date: _____

Section B:
(Please tick one or both)

I **do not** authorize Selkirk Montessori School to:

- request, or
- release information regarding my child for the reasons listed below:

Parent/Guardian Signature(s): _____
Date: _____

Please return to: Selkirk Montessori School
2970 Jutland Road, Victoria, BC V8T 5K2
Tel: 250-384-3414 Fax: 250-384-3449

REV Oct 2017-kw