



EDUCATION DOCUMENT RETENTION

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Policy Sponsor:	Education Department	Last Revised:	04/27/2026
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1. Purpose

The purpose of this policy is to establish clear and consistent standards for the retention, storage, archival preservation, anonymization, and destruction of records maintained by the WFN Education Department.

The Education Department produces and maintains a large number of documents in the course of delivering educational programs and services to community members. These documents may include student records, program documentation, financial records, operational files, and governance documents. Many of these records contain personal information or documentation that supports departmental decision-making, program delivery, and financial accountability.

Without clear retention standards, records may be retained longer than necessary, destroyed prematurely, or stored in ways that create risks to privacy and operational continuity. The purpose of this policy is therefore to ensure that records are managed responsibly throughout their lifecycle while preserving those records that hold long-term value to the department or the community.

2. Scope

This policy applies to all records created, received, or maintained by the WFN Education Department in the course of performing departmental functions.

The policy applies to both physical and digital records, including documents stored in electronic formats within departmental systems. This policy also applies specifically to records that constitute official or master copies of a document maintained by the Education Department. Working drafts, duplicates, convenience copies, or informal notes that do not represent the official record are not considered master records and are not subject to the retention schedule outlined in this policy.

The policy applies only to Education Department records and does not override retention schedules or record management practices that may exist in other WFN departments.

3. Authority

This policy is issued under the authority of the WFN Education Department and is approved by Chief and Council.

All Education Department staff are required to comply with the standards outlined in this policy. The policy establishes minimum retention requirements and operational expectations for how records are maintained, reviewed, archived, anonymized, or destroyed.

4. Guiding Principles

The management of Education Department records is guided by several key principles that support responsible governance and community accountability.

4.1. Accountability and Transparency

Records provide evidence of decisions, actions, and program delivery carried out by the Department. Proper records management ensures that these activities can be reviewed and understood when required, supporting transparency in the administration of educational programs and services.

4.2. Privacy and Protection of Personal Information

Many Education Department records contain sensitive personal information relating to students, families, and community members. These records must be handled carefully and stored securely in order to protect the privacy and dignity of those individuals.

4.3. Preservation of Significant Records

Certain records provide long-term historical value because they document major events, program development, or governance decisions. These records should be preserved indefinitely so that the history and development of education services within WFN can be understood by future generations.

4.4. Responsible Data Stewardship

Not all records need to be preserved indefinitely in their original form. Where records contain useful data but no longer require identifiable personal information, they may be anonymized so that the information can continue to support planning, evaluation, and research while protecting individual privacy.

4.5. Secure Disposal

When records reach the end of their retention period and are no longer required for operational, legal, financial, or historical purposes, they must be destroyed securely and in a manner that protects confidential information.

5. Definitions

5.1. Master or Official Record

The master record, sometimes referred to as the official record, is the authoritative version of a document maintained by the Education Department as evidence of an activity, decision, transaction, or event.

Only the master record copy is subject to the retention rules defined in this policy. Duplicate copies or temporary working documents may be disposed of when they are no longer required.

5.2. Student Record

A student record is any document containing identifiable information about a student receiving services through the Education Department. This may include information relating to academic participation, program supports, transportation services, or funding assistance.

5.3. Administrative Record

Administrative records include documents relating to departmental operations, program administration, financial activities, reporting requirements, and governance activities.

5.4. Anonymization

Anonymization refers to the process of removing personal identifiers from a document or dataset so that individuals cannot be identified. This allows useful information to be retained for statistical analysis of program planning without compromising privacy.

6. Superseded Records

Certain documents, particularly governance documents such as policies, procedures, and standards, may be replaced or updated over time. When a document is superseded by a newer version, the previous version should not automatically be destroyed.

Superseded versions of governance documents should normally be retained and preserved in accordance with the retention schedule (500.01-STD-DATA-Education_Document_Retention_Schedule) to maintain a historical record of departmental policies, operational practices, and governance decisions. These records may be transferred to archival storage as part of the institutional history of the Department.

7. Record Categories

Education Department records fall into several general categories that reflect the functions of the department.

These categories include:

- Student academic records
- Student financial assistance records
- Transportation records
- Incident and safety records
- Program participation records
- Administrative and operational records
- Departmental financial records
- Staff administrative records
- Governance and policy records

Specific retention periods for these records are outlined in 500.01-STD-DATA-Education_Document_Retention_Schedule.

8. Retention Standards

Retention standards determine how long a record must be preserved before it may be destroyed, anonymized, or transferred to archival storage.

8.1. Student Records

In most cases, student records are retained according to a retention schedule based on the age of the student. This approach recognizes that many Departmental services are provided to children and youth and that records may be required after the student graduates or retires from school.

Student records must therefore be retained until the retention period specified in 500.01-STD-DATA-Education_Document_Retention_Schedule.

8.2. Ontario Student Record (OSR) Related Records

Certain Education Department records may form part of, support, or replicate information contained within an Ontario Student Record.

Where Education Department records correspond to OSR documentation, those records must be retained for fifty (50) years from the student's graduation, withdrawal, or retirement from school.

This retention requirement overrides any shorter retention periods that might otherwise apply to student records.

8.3. Administrative Records

Administrative and operational records are retained based on fiscal year cycles. These records typically relate to budgeting, reporting, program administration, and departmental management activities.

Retention periods for administrative records are defined within the Document Retention Schedule.

8.4. Permanent Records

Certain records must be preserved indefinitely due to their historical, governance, or evidentiary significance.

Permanent records may include policies, procedures, major program documentation, and records demonstrating that significant events occurred within the Education Department.

These records form part of the institutional memory of the department and may eventually be transferred to the WFN community archival system.

9. Records Storage

Official Education Department records must be stored in a manner that preserves their integrity, protects, confidential information, and ensures that records remain accessible for the duration of their retention period.

9.1. Digital Records Storage

Digital records designated as official or master records must be stored within the shared drive or within another separated, but authorized, departmental system approved for record storage. These systems must be organized in a consistent manner that allows records to be retrieved efficiently while also supporting compliance with retention and disposition requirements.

The Digital Records Storage Standard (500.02-STD-DATA-Education_Digital_Records_Storage), details these requirements.

9.2. Physical Record Storage

Where physical records are expected to be retained for extended periods of time, particularly where records are designated for permanent preservation or archival transfer, the Education Department must ensure that appropriate preservation practices are used. This includes the use of archival-grade storage materials and protective containers designed to prevent deterioration caused by light exposure, acidity, moisture, and environmental fluctuations.

To support consistent physical preservation practices, the Education Department will establish a Physical Records Storage Standard (500.03-STD-DATA-Education_Physical_Records_Storage). This standard will serve as an operational companion to this policy and may be updated as required to reflect best practices in digital records organization and preservation.

This document will define the standards for:

- The organization and labeling of physical records
- Approved storage locations for departmental records
- Environmental considerations for record storage
- The use of archival-quality folders, sleeves, and storage boxes
- Procedures for preparing records for long-term archival preservation

The Physical Records Storage Standard will serve as an operational companion to this policy and may be updated as required to reflect best practices in records preservation and archival management.

10. Implementation

The implementation of this policy is supported by Education Department procedures, standards, and guidelines that outline the operational processes required to manage records throughout their lifecycle.

These procedures may include, but are not limited to:

- Records Classification
 - o 500.04-STD-DATA-Education_Records_Classification
- Digital File Organization
 - o 500.02-STD-DATA-Education_Digital_Records_Storage
- Retention Monitoring
 - o 500.05-PRO-DATA-Education_Retention_Monitoring
- Records Destruction Authorization and Logging
 - o 500.06-PRO-DATA-Education_Records_Destruction_&_Logging
 - 500.06.01-TMP-DATA-Education_Records_Destruction
 - 500.06.02-TMP-DATA-Education_Records_Destruction_Log
- Archival Review and Transfer
 - o 500.07-PRO-DATA-Education_Records_Archival_Transfer
- Physical Records Storage Standards
 - o 500.03-STD-DATA-Education_Physical_Records_Storage

11. Access to Records

Access to Education Department records is limited to authorized personnel who require the information for legitimate operational purposes.

Where appropriate, students or parents/guardians may request access to records that contain their personal information. Such requests must be handled according to the WFN Request for Information (RFI) Policy.

12. Records Disposition

When a record reaches the end of its retention period, it must undergo a disposition review to determine the appropriate outcome.

Records may be:

- Retained for operational reasons
- Anonymized for statistical use
- Securely destroyed
- Transferred to archival storage

The appropriate disposition must be determined by the Education Services Manager.

13. Archival Preservation

Certain records possess long-term historical value and should be preserved indefinitely.

Records that should be considered for archival preservation include:

- Education Department policies and procedures
- Documentation of major educational initiatives
- Records demonstrating significant events or incidents
- Strategic planning documents
- Program creation documentation
- Major departmental reports

These records may eventually be transferred to the WFN community archival system so that they remain available as part of the history of the community's education services.

Student records are generally not archived in identifiable form unless they document significant events or investigations. In most cases, historical student data will be anonymized before long-term preservation.

14. Archival Review

Before records are destroyed at the end of their retention period, they must be reviewed to determine whether they possess historical, governance, or evidentiary value that warrants archival preservation.

Records may be designated for archival preservation when they:

- Document significant events or incidents
- Reflect major program developments or initiatives
- Capture the history and evolution of education services within the community
- Contain information that may be valuable for long-term research or historical reference

Where records are determined to have archival value, they should be transferred to archival storage in accordance with this policy. Records designated for archival preservation should be stored using appropriate archival storage practices.

15. Records Destruction

Records may only be destroyed after their retention period has expired and when no legal, investigative, or administrative processes require their preservation. Approved destruction methods include secure shredding of physical records, permanent deletion of digital files, or other methods that ensure confidential information cannot be recovered.

All destruction activities must be documented in a records destruction log maintained by the Education Department.

The log must include:

- The category of records destroyed
- The date range of the records
- The destruction date
- The method of destruction
- The name of the person authorizing the destruction

16. Litigation Hold

In certain circumstances, records that would otherwise be eligible for destruction must be preserved due to their relevancy in an investigation, audit, complaint, or legal proceeding.

A litigation hold occurs when the Education Department becomes aware that records may be required as evidence or documentation in relation to a matter under review. This may include situations such as:

- Internal administrative reviews
- Formal complaints submitted by students, families, or members
- Financial audits or program compliance reviews
- Safety investigations or incident reviews
- Legal proceedings or disputes involving WFN

When a litigation hold is in effect, any records that may reasonably relate to the matter must be preserved regardless of their normal retention schedule. Records that would normally be destroyed or anonymized must instead remain intact until the matter has been fully resolved.

The Education Director, in consultation with the Education Services Manager, will determine whether a litigation hold is required and which records must be preserved. Once a litigation hold has been established, staff must insure that affected records are not altered, deleted, destroyed, or otherwise modified.

A litigation hold remains in effect until the matter giving rise to the hold has been formally concluded and the Education Director authorizes the release of the hold.

17. Training

Effective document retention and records management depend on staff understanding their responsibilities and the procedures that support this policy. The Education Department will therefore provide training and guidance to staff where required to ensure that records are managed in a consistent and responsible manner.

Training may include instruction on:

- Identifying and maintaining official or master records
- Organizing and storing documents within the Shared Drive
- Understanding retention timelines and disposition rules
- Protecting confidential and sensitive information
- Recognizing when records should be anonymized, archived, or destroyed
- Applying physical storage standards for paper records

Training may be delivered during staff orientation, periodic departmental training sessions, or when new procedures or guidelines are introduced under this policy.

Where appropriate, the Education Services Manager may also provide guidance or clarification to staff regarding how records should be managed in specific situations. The goal of this training approach is to ensure that records management practices are applied consistently across all Education Department programs.

18. Review and Revision

Records management practices must remain responsive to changes in departmental operations, program delivery, governance requirements, and evolving best practices in information management. For this reason, the Education Department will review this policy on a regular basis to ensure that it continues to meet operational needs and governance expectations.

This policy will be formally reviewed at least once per year. The review will consider whether:

- Retention timelines remain appropriate for departmental activities

- New record types or program documentation require inclusion in the retention schedule
- Archival or anonymization practices should be updated
- Storage practices remain adequate for both digital and physical records

The review process also provides an opportunity to identify operational challenges encountered by staff in implementing the policy and to ensure that supporting procedures and guidelines remain aligned with departmental practices.

Minor or administrative amendments to this policy that do not alter its intention or core criteria may be made with the approval of the Executive Director, without requiring formal review or approval by Chief and Council.

18.1. REVISION HISTORY

Date: (mm/dd/yyyy)	Motions