



STUDENT RECORDS POLICY			
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Last Revised:	July 2021	Review Scheduled:	2023

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.

1) Policy Statements:

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

Meadow Montessori School will:

- a) Ensure that the lead administrator 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.
- b) Only collect, use or disclose personal information with the consent of the individual student or legal guardian, unless otherwise authorized under PIPA.
- c) On or before collecting personal information, disclose to the individual student/family verbally or in writing the purposes for the collection of personal information.
- d) 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.
- e) Secure Student Records and Student Files with access within the school authority restricted to those individuals who, by the nature of their work, are required to have access to the information.
- f) 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 lead administrator or designate.
- g) Subject to legal requirements, ensure that personal information will be retained only for the period of time required to fulfill the purpose for which it was collected.
- h) Inform parents that concerns, complaints and questions about personal information handling policies and practices of the school authority may be directed to the school’s Administration by calling the school office.

2) PERMANENT STUDENT RECORD (Transferable)

Note: where consent to collect student record data is an issue, two consents may be required depending on the circumstance: consent of the student in relation to collection of personal information of the student (for students capable of exercising their PIPA rights) and consent of the parent or guardian in relation to collection of personal information about that person.

A. Elements of the Student Record (Student Records Order, Section 2)

Required Items

1. The Permanent Student Record, as defined in the Order:
 - a. Form 1704, PSB 048 (revised 1997) completed according to the current Permanent Student Record Instructions requirements
 - b. Copies of a minimum of the two most recent years of Student Progress Reports or an official transcript of grades
2. Student Learning Plan (SLP) only as applicable to students in DL programs (see Section 3.3 of the “Standards for Delivery of K-12 Independent School Distributed Learning in British Columbia”).
[NOTE: Schools frequently provide a 1-2 page SLP Overview to fulfill this requirement, rather than including the entire SLP document. SLP overviews provide students’ personal and career plans and generally include such items as short-term and long-term goals regarding academic planning, personal health and well-being, career planning and work experience. Strategies planned and activities initiated are frequently listed by school year.]
3. Individual Education Plan (IEP) where applicable
4. Copies of documents listed as inclusions (see explanatory information in section B. below).

B. Permanent Student Record (Form 1704) Inclusions

Inclusions are documents (or copies of documents) used to plan or support a student’s educational program. Not all students will have inclusions as part of their Permanent Student Record. Inclusions are listed in the “Inclusion Section” on Form 1704, noting date entered, title and expiry/rescinded date (if applicable). If the space for inclusions becomes full, it may be necessary to create a second portion and attach it to the form for future additions.

Documents listed as Permanent Student Record inclusions on Form 1704 become components of the Permanent Student Record and are required to be transferred with Form 1704 if the student enrolls in another school.

1. Required Inclusions

The following items must be filed with Form 1704, and dated and listed as an inclusion in the appropriate section on Form 1704, for any student to whom these may apply:

- a) 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
- b) court orders as indicated by the legal alert checkbox (see Form 1704) or their rescinding date if applicable;
- c) other legal documents (e.g. name change or immigration document);
- d) support services information (e.g. psychometric testing, speech and hearing tests,

- adjudication requirements for completing assessment activities);
- e) Individual Education Plans (IEP's) or Case Management Plans (CMP's);
- f) Notification of student being homeschooled

2. Optional Inclusions

The following optional inclusions may be listed on Form 1704 but the school is not required to do so:

- a) standardized test scores;
- b) records of information which an educator deems relevant and important to the educational program of the student;
- c) award information (Ministry awards information should include year, date and serial number of the award).

Note: If the school chooses to list an item as an inclusion, then it is required that the document(s) supporting the item listed be filed with Form 1704 as an inclusion and these items then become part of the Permanent Student Record. The school may wish to acquire specific consent for these optional items to be included.

If the school chooses not to include the previous optional items on Form 1704 as a PSR inclusion, it may include them as additional Student Record items (see Part II – Additional Student Record Items) but should take note that these items are then NOT part of the Permanent Student Record.

C. Form 1704 Currency and Format

Information should be updated as it changes and the student progresses through the British Columbia school system. School policy should designate who is responsible for updating Permanent Student Record Form 1704 with its inclusions. A completed, current Form 1704 must be in every student's Permanent Student Record or a school must be able to produce it electronically or in print from its student data management system.

Data for Form 1704 may be stored in electronic and/or paper format. If Form 1704 data are stored in electronic format:

1. the school must be capable of recreating the data in case of a system failure;
2. printouts must represent the same fields as on Form 1704.

D. PSR Retention

The PSR should be retained by schools until another school requests the PSR or for 55 years after a student has withdrawn and not enrolled in another K-12 school, or graduated from the school. Permanent Student Records should be stored securely and in a manner that ensures the record's preservation from calamity (fire, flood, etc.). Furthermore, the school is required (under Section 34 of PIPA) to protect personal information from unauthorized access, collection, use, disclosure, copying, modification, or disposal, or similar risks.

If a student withdraws from an authority's school and enrolls in another K-12 educational institution, the authority must, upon request from the enrolling K-12 educational institution, transfer the PSR. (See section 5 of the Order and section 10 of the Regulation) Additional student record items (see Part II below) are not part of the transferable Permanent Student Record and may be returned to students, disposed of, or retained according to school policy.

[NOTE: Student discipline records may provide critical evidence for future dispute situations.]

3) ADDITIONAL STUDENT RECORD ITEMS

(For school use only and not part of the Transferable Permanent Student Record)

Aside from the Permanent Student Record, there are other items which must (See Section A.1 below) or may (See Section A.2 below) be included in the school's student records. For instance, student and parental/legal guardian information is required for all independent school students and additional items may be required by individual school policy. Location of the Permanent Student Record and additional student record items is locally determined by school policy. The number of additional items included may vary with each individual student.

A. Additional Items

1. Required Items

The following items must be included in student records to establish student eligibility for funding and ensure that student health and safety information is complete:

- a) legal name of child - verify the original and file a photocopy or scanned copy of birth certificate or similar legitimate identification document;
- b) official name(s) of parent(s) or guardian(s) with home and work contact information
- c) document verifying the information about the student's parent or guardian in respect of students eligible for funding (see Appendices for verification details and suggested document format for inclusion in school registration)

2. Optional Items

The following optional items may be included in the additional items according to school developed student records policy to address educational and/or safety needs of students:

- a) care card number
- b) emergency contact numbers;
- c) doctor's name and contact information;
- d) allergies, medication and/or other health concerns (other than those required to be listed under the medical alerts rubric as tabulated in PART I Section (B)(1)(a);
- e) previous student progress reports (other than the two most recent years required in the PSR;
- f) serious student discipline reports (e.g., copies of letters to parents/guardians regarding discipline matters and corrective actions taken);
- g) reports of important meetings/discussions relating to the student.

B. Sensitive Student Record Information

1. Examples information that could be seen as "sensitive"

- a) psychiatric reports;
- b) family assessments;

- c) referrals to or reports from school arranged counseling services;
- d) record of a school-initiated report of alleged sexual or physical child abuse made to a child protection social worker under section 14 of the Child, Family and Community Service Act.

2. Handling Procedures

- a) obtain parental consent for collection, use, and disclosure of psychiatric reports store where only the school principal or persons authorized by the principal can access such information;
- b) disclose or transfer only according to law;
- c) handle records of reports under section 14 of the Child, Family and Community Service Act, according to instructions in the previous NOTE, under "sensitive information".
- d) and family assessments (written, dated and signed consent is best);

4) Procedures

a) The lead administrator or designate will be responsible for:

- i) Updating the student PSR as information changes and the student progresses through the system and regularly update and review every year in September;
- ii) Ensuring that 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
- iii) Ensuring that the school authority takes necessary precautions to safeguard against deprecated or obsolete forms of storage. The electronic storage of PSRs and other personal information requires the school authority to have an adequate backup plan and recovery strategy for potential hardware failure and database corruption.

b) Student Record and Student File Retention:

i) Student Records – Active Students

(1) 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.

(2) The school authority protects personal information from unauthorized access, collection, use, disclosure, copying, modification, or disposal, or similar risks. Procedures for such protection are outlined in sections 5 and 6 below.

(3) The lead administrator or designate will regularly review Student Records to ensure that the information is current and complies with legal requirements. *Required inclusions must be listed on the PSR – see section 2b above.*

ii) Student Records – Inactive Students

(1) Unless another school requests a Student Record (see section 6 below), the school authority archives Student Records for 55 years after a student has withdrawn and not enrolled in another K-12 school or graduated from the school.

(2) 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 lead administrator or designate.

(3) The designated records clerk keeps a record of Student Records that are destroyed (shredded) after 55 years.

iii) Student Files – Active Students

(1) 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.

(2) The school authority protects personal information from unauthorized access, collection, use, disclosure, copying, modification, or disposal, or similar risks. Procedures for such protection are outlined in sections 5 and 6 below.

(3) The lead administrator or designate will regularly review Student Files to ensure that the information is relevant and important to the educational program of the student.

iv) Student Files – Inactive Students

(1) The school authority archives Student Records for 55 years after the student has withdrawn and not enrolled in another K-12 school or graduated from the school.

(2) 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 administration or designate.

(3) The lead administrator or designate is responsible for determining the relevancy of the contents in Student Records before being archived.

c) Currency of Student Records

Student eligibility information (see Appendix I) will be updated during student enrolment each year.

As stated above, the lead administrator or designate will regularly review Student Records and Student Files to ensure that the information is current and complies with legal requirements.

d) Security of Student Information Off-Campus

The lead administrator is responsible for ensuring that personal information taken off campus is safely stored, and that personal information is protected.

e) Handling of Sensitive Student Information

Access to Sensitive Student Information is restricted to the lead administrator or a person or persons authorized by the lead administrator to access such information defined in section 2d of this policy.

The lead administrator or designate 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.

Sensitive Student Information will only be disclosed or transferred in accordance with the law.

The lead administrator 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 lead administrator or designate can access them.

5) Use of Student Personal Information

The school authority may use an individual student's personal information for the following purposes, assuming that the school has disclosed such purposes to the individual student verbally or in writing on or before collecting the personal information:

- a) 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 school authority.
- b) To enable the authority to operate its administrative function, including payment of fees and maintenance of ancillary school programs such as parent voluntary groups and fundraising activities.
- c) 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.

6) Access to and Disclosure of Student Records

- a) A student (capable of exercising PIPA rights) and a parent/legal guardian of a student is permitted (unless restricted by a court order) to:
 - i) examine all student records kept by a school pertaining to that student, while accompanied by the principal or a person designated by the principal to interpret the records;
 - ii) Receive a copy of any student record upon request. The school authority reserves the right to recover the direct cost of copying records.
- b) In addition to parents/guardians and students, access to student records should only be granted, upon assurance of confidentiality to:
 - i) professionals who are planning for, or delivering education, health, social or other support services to that student (consent not required for record access);
 - ii) school authority's insurer to defend any claim/potential claim (consent for record access required).

7) Transfer of Student Records

- a) 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 school authority will transfer that student's PSR (including declared inclusions), the current Student Learning Plan (if any), and the current IEP (if any) to the requesting institution. The school authority will retain a copy of the PSR, indicating the school where the records have been sent and the date of the student record transfer.
- b) If the requesting institution is outside British Columbia, a photocopy of the PSR will be sent (including declared inclusions), along with the current Student Learning Plan (if any), and the current IEP (if any).
- c) 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) and current Student Learning Plan (if applicable) and IEP (if applicable) to the independent school authority. The original PSR must be retained by the public school
- d) The school authority will only transfer sensitive, confidential information (e.g. psychiatric assessments) after dated and signed parent/guardian consent has been obtained
- e) The school authority 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
- f) A summary of a former student's school progress may be provided to prospective employers, at the written request of a former student. The school authority reserves the right to assess a fee for this service
- g) A Student Record will be reviewed when a student transfers. The lead administrator 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.

8) QUICK REFERENCE CHART

	PERMANENT STUDENT RECORD – PSR (TRANSFERABLE)	ADDITIONAL SCHOOL FILE ITEMS (NON TRANSFERABLE)
REQUIRED ELEMENTS	<ol style="list-style-type: none"> 1. 1704 WITH LIST OF INCLUSIONS (IF ANY) 2. STUDENT PROGRESS REPORTS (MOST RECENT 2 YEARS OR TRANSCRIPT) 3. COPIES OF INCLUSIONS (IF ANY) <ol style="list-style-type: none"> A. HEALTH SERVICES INFORMATION IN REFERENCE TO THE ‘MEDICAL ALERT’ CHECKBOX B. COURT ORDERS IN REFERENCE TO THE ‘LEGAL ALERT’ CHECKBOX C. SUPPORT SERVICES INFORMATION (PSYCHOMETRIC ASSESSMENTS, ETC) D. IEP OR CMP E. NOTIFICATION OF STUDENT BEING HOMESCHOOLED 	<ol style="list-style-type: none"> 1. LEGAL NAME (COPY OF BIRTH CERTIFICATE) 2. OFFICIAL NAMES OF PARENTS OR GUARDIANS AND CONTACT INFORMATION 3. PARENTAL/GUARDIAN LEGAL RESIDENCY IN BC
OPTIONAL ELEMENTS	<ol style="list-style-type: none"> F. STANDARDIZED TESTS G. RECORDS OF INFORMATION RELEVANT TO STUDENT’S EDUCATIONAL PROGRAM H. AWARD INFORMATION <p>NOTE. THESE ITEMS, ONCE INCLUDED AS PART OF THE PERMANENT STUDENT RECORD, DO BECOME TRANSFERABLE.</p>	<ol style="list-style-type: none"> 4. CARECARD/BC SERVICE CARD NUMBER 5. OTHER HEALTH OR MEDICAL CONCERNS THAT MAY AFFECT THE STUDENT IN LESS SERIOUS WAYS 6. EMERGENCY CONTACT INFORMATION 7. FAMILY PHYSICIAN’S NAME AND CONTACT INFORMATION 8. OTHER PROGRESS REPORTS 9. SERIOUS DISCIPLINE REPORTS 10. IMPORTANT MEETING REPORTS 11. SENSITIVE INFORMATION

APPENDIX I

ELIGIBLE STUDENT INFORMATION

Group 1 and 2 Independent School Grants

To be eligible the student's parent/legal guardian must be:

- Lawfully admitted to Canada
- Resident of British Columbia

The Independent School Regulation reads as follows:

“eligible student” means a student

- (a) who is of school age, and
- (b) whose parent or guardian
 - (i) is, or was at the time of that parent's, or guardian's death, a citizen of Canada, or a permanent resident, as defined in the Immigration and Refugee Protection Act (Canada), who is, or was at the time of the parent's, or guardian's death, ordinarily resident in British Columbia, or
 - (ii) is lawfully admitted to Canada and is ordinarily resident in British Columbia.

“guardian” means guardian of the person of a child within the meaning of the Family Relations Act;

A parent or legal guardian is lawfully admitted to Canada within the meaning of paragraph (b)(ii) of the above definition of an “eligible student” if he or she is in one of the following categories:

- A person who has been determined under the Immigration and Refugee Protection Act (Canada) to be a Convention refugee or refugee claimant
- Holder of a valid student permit issued for one year or more under the Immigration and Refugee Protection Act (Canada)
- Holder of a valid work permit issued for one year or more under the Immigration and Refugee Protection Act (Canada)
- Diplomat or consular official

APPENDIX II

STATUS OF PARENT/GUARDIAN (ADMISSION TO CANADA AND RESIDENCY) - FORM A

(if parents are deceased, use Form B)

To be completed and signed by a parent or legal (court-appointed) guardian. (If legal guardian, attach copy of court order appointing you as legal guardian).

(Lawfully Admitted into Canada)

1. I am (please X one):

- A Canadian citizen (if not born in Canada, please attach a photocopy of citizenship paper/card)
- A Permanent Resident (landed immigrant) (attach photocopy of landed immigrant status paper or PR card)
- Lawfully admitted into Canada under the Immigration and Refugee Protection Act (Canada) with one of the following documents (please mark the appropriate box below and attach photocopy of document):
- Admission as a refugee or refugee claimant
 - Valid student permit for two or more years (or issued for one year but anticipated to be renewed for one or more additional years)
 - Valid employment authorization (work permit) for two or more years (or issued for one year but anticipated to be renewed for one or more additional years)
- A person carrying out official duties under the authority of the Visiting Forces Act or as an accredited diplomatic agent, preclearance officer, consular officer or official representative in Canada of a foreign government with a consular post in British Columbia.
- Other - Document description: (must be cleared with Citizenship and Immigration Canada)
- _____
- _____

(Residency in British Columbia)

2. I am a resident of British Columbia (please X one):

- Yes Residency address: _____
- _____
- _____
- No I am not a resident of British Columbia

Confirming signatures:

3. Parent/Legal Guardian's name: _____
- Parent/Legal Guardian's signature: _____
- Date: _____

APPENDIX III

STATUS OF DECEASED PARENT (ADMISSION TO CANADA AND RESIDENCY) - FORM B

To be completed and signed by the student or a knowledgeable adult (one who knew the student's parent(s) and has knowledge of the facts respecting their decease and the matters set out in this document)

(Deceased parent was Lawfully Admitted into Canada)

1. The student's deceased Parent was at time of death:

A Canadian citizen

A Permanent Resident (landed immigrant)

(Deceased parent was Resident in British Columbia)

2. The student's deceased parent was at time of death a resident of British Columbia (please X one):

Yes Residency address: _____

No I am not a resident of British Columbia

Confirming signature:

Student: _____

Knowledgeable Adult's Name: _____

Knowledgeable Adult's Signature: _____

(Knowledgeable Adult is one who knew the student's parent(s) and has knowledge of the facts respecting their decease and the matters set out in this document)

Date: _____