



BOARD ADMINISTRATIVE PROCEDURE	
Administrative Procedure OSR (Ontario Student Record) Management	Administrative Procedure Number 1203
Directional Policy 1200 - Records and Information	

Title of Administrative Procedure:

Ontario Student Record (OSR) Management

Date Approved:

October 15, 2024

Projected Review Date:

2029

Directional Policy Alignment:

The Ontario Student Record (OSR) Management Administrative Procedure aligns with Directional Policy 1200 – Records and Information Management by establishing a consistent procedure to manage Ontario Student Records in accordance with relevant provincial legislation.

Alignment With Multi-Year Strategic Plan:

The Ontario Student Record (OSR) Management Administrative Procedure supports the Board’s Multi-Year Strategic Plan to maximize resources.

[PVNCCDSB Board Vision, Mission and Strategic Priorities](#)

Action Required:

1.0 Background

An Ontario Student Record (OSR) is a collection of records documenting a student's academic career for elementary and secondary education in Ontario. One OSR will be established for every enrolled student including international, out of province, and exchange students.

The Education Act and the Ministry of Education's Ontario Student Record Guideline, 2000 obligates school boards to create and maintain an OSR for every student. These authorities set out the policies of the Ministry of Education with regards to the establishment, maintenance, use, retention, transfer and disposal of the OSR.

Additionally, these authorities set out minimum content for OSRs and direct school boards to identify further student information "conducive to the improvement of instruction and other education" to be retained in the OSR.

Actions impacting the collection, access or use, disclosure or destruction of student information contrary to federal or Ontario legislation and this Administrative Procedure are prohibited.

2.0 Content

OSR content is personal and subject to the provisions of the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), and, in some cases, the Personal Health Information Protection Act (PHIPA).

Ministry Directed Content:

1. OSR Folder
2. Report Cards
3. Ontario Student Transcript
4. Documentation File (when records exist)
5. Office Index Card (an associated record not filed in the OSR)

6. Accumulated instruction in French as a Second Language in elementary school
7. Behaviour, Discipline and Safety

Board Directed Content:

1. Achievement/Assessment
2. Biographical information
3. Communications/Consents
4. Enrolment
5. Scheduling
6. Program

The OSR Content Directory, a supporting document of this Administrative Procedure, includes the complete list of records to be retained in the OSR, should they exist, and prescribes the organization, retention, format and transferability of the records. The content of this directory is also recorded in the Board's Records Classification and Retention Schedule (CRS). The OSR content directory may be subject to change and significant changes will be communicated to appropriate staff through a Board memo.

3.0 Security

Mechanisms for the security and confidentiality of OSRs must be adhered to. These include:

1. Storing OSRs in locked cabinets or rooms
2. Logging out of online platforms
(e.g. the student information system when not in use)
3. Adhering to a sign-out procedure for OSR access
4. Returning all OSRs to locked storage at the end of each work day
5. Restricting access as described in this procedure
6. Transporting OSRs using mechanisms that ensure security and confidentiality
(e.g. carefully sealing mailing envelopes and marking them "confidential")

4.0 Access

Every person shall preserve confidentiality in respect of the content of all student information, including the OSR and other student information that comes to the person's knowledge in the course of the person's duties or employment and no such person shall communicate any such knowledge to any other person except where right of access is determined.

The Board will provide parents and legal guardians with access to information about a child's education, health and welfare while at school unless a written separation agreement, parenting order or other court document to the contrary has been provided by either parent or legal guardian or if another law does not permit it.

Right of access to OSRs is established in Ontario acts of legislature, Board procedure and Ministry directives.

Right of access:

In the school:

1. Student
2. Parents/legal guardians (if student is a minor), unless a parenting order or other court issued document or other law that does not permit it, e.g. MFIPPA s.38, revokes access to information. Where no court orders or agreements exist and parents live separate and apart, access by both parents will continue as if they were still living together until such time as documentation states otherwise
3. Principals, teachers, secretaries, early childhood educators, and special education consultants and safe schools teachers assigned to the school

Within the Board:

1. Superintendents
2. Board staff with responsibilities associated with the management of student information such as information technology, records and information management, freedom of information and protection of privacy and administrative assistants

3. Board staff who have a signed form OSR-4-Consent to Access the OSR in place

External:

1. The police can access a student's OSR in exigent circumstances without a warrant, under section 487.1.1 of the Criminal Code. Section 32 (g) of MFIPPA expressly permits a school board to disclose confidential information to the police to aid in an investigation undertaken with a view to where a law enforcement proceeding is likely to result.
2. Children's Aid Society
3. The Office of the Information and Privacy Commission of Ontario
4. In response to a court order, subpoena or search warrant and as outlined in s.266 of the Education Act
5. The Medical Officer of Health with respect to certain information as outlined in s.266 of the Education Act
6. Lawyers representing the Office of the Children's Lawyer

Access with written permission:

1. Parents and legal guardians of students aged 18 or older. The parent or guardian of a pupil who is not mentally capable will retain the right to access the records relating to that student after they have reached 18 years of age
2. Parents and legal guardians when a pupil, between the ages of 16 to 18, has withdrawn from parental control.
3. Special educational support staff of the board (e.g. social workers, educational assistants, speech and language pathologists and psychometrists).
4. Anyone granted permission by a legal guardian who has court assigned decision-making responsibility.

No right of access:

1. Parents or guardians of a student over the age of 18, unless the student has provided consent.

2. Parents or guardians where a court assigned parenting order has revoked access to information rights.
3. Foster parents unless confirmed as legal guardians
4. Volunteers
5. Trustees

Age of Majority:

When a student turns 18, the age of majority, they are legally considered an adult, and they have the right to control access to their personal information. This means that the school must obtain the student's explicit consent before sharing any information with their parents/guardians including the Ontario Student Record and other information collected by the school such as attendance and report cards.

To comply with MFIPPA when a student turns 18, schools shall take the following steps:

- **Notification:** Inform students and their parents/guardians before the student turns 18 about the changes in information sharing practices. [A sample letter is provided here.](#)
- **Consent:** Provide an opportunity for the student to consent to ongoing information sharing with their parents/guardians using the form: [Consent for Information Sharing – Student at the Age of Majority.](#)
- **Record:** File signed consent forms in the OSR and record it in the student information system. A student who has reached the age of majority can revoke consent in writing at any time. If this occurs, ensure documentation is retained in the OSR and noted in the student information system.
- If a consent form is not received when the student turns 18, information sharing with parents/guardians must cease.

5.0 Responding to requests for student records

Schools and the Board receive requests to access student records from both active students and retired students. The following guidelines should be followed in determining whether access should be facilitated at the school level or the central level (Records and Information Management Services).

- 1) Elementary and secondary schools are to facilitate access requests for all students actively enrolled in school.

- 2) Secondary schools are to process access requests for any retired students five years post-graduation, with the exception of Ontario Student Transcript requests (see below). Schools shall refer access requests from students who have graduated more than five years ago to Records and Information Management Services.
- 3) Secondary schools are to process requests for Ontario Student Transcripts for active students.
- 4) Records and Information Management Services is to process all other requests for Ontario Student Transcripts centrally.

6.0 Collecting Fees

Fees associated with processing student record requests are to be collected in accordance with the Fees Guide for Student Record Requests.

Responsibilities:

The Board of Trustees is responsible for:

- Ensuring alignment with the Records and Information Directional Policy.
- Reviewing the Ontario Student Record (OSR) Management Administrative Procedure as part of its regular policy and procedures review cycle.

The Director of Education is responsible for:

- Designating resources for ensuring the implementation of and compliance with this Administrative Procedure.

Superintendents are responsible for:

- Ensuring principals are consistent with the application of this Administrative Procedure.
- Ensuring that any employee for whom they have supervisory responsibility are aware of the requirements under this Administrative Procedure and that employees follow the requirement and adhere to the confidentiality and security requirements afforded the OSR.
- Assist the school principal with responsibilities and duties as assigned.
- Rule on disagreements with respect to parent requests to alter OSR records.

Principals are responsible for:

A. Overseeing the management of OSRs at the school as follows:

1. Ensure the creation, acquisition, maintenance, retention, transfer and disposition of OSRs is in accordance with legislation, Board procedure and Ministry instruction.
2. Ensure security, access and content of OSRs is in keeping with Ministry guidelines and this Administrative Procedure.
3. Delegate responsibilities as necessary to vice principals, teachers, guidance teachers and secretaries.

B. Overseeing the accuracy of biographical information of each student as follows:

1. Delegate responsibility to verify date of birth, legal name, gender, and assigned identification numbers using appropriate identity documents and confirming the verification by initialing the OSR folder.
2. Delegate responsibility to update biographical information at the start of each school year. This includes home address, contact information, and parent information.
3. Accept a “repute” name where it is in the best interest of the student to do so, i.e. the student has been known by the repute name exclusively. The legal surname remains recorded on the OSR in parentheses following the repute name. Both names are recorded in the student information system. The Ontario Education Number (OEN) remains the same.
4. Accept a new legal name or change in gender designation when presented with new identity documentation from the Ontario Registrar General e.g. Birth Certificate. Keep a record of verification of documentation. Update the OSR and student information system accordingly; both the active and inactive record.

C. Ensuring proper access as follows:

1. Permit access by those who have a right of access and deny access to those with no right of access. Refer to parenting order, separation agreement or other court document, where they exist, for direction.

School Principals will notify their School Superintendent when requests for access are made by law enforcement or lawyers.

2. Enforce the use of the Consent to Access the OSR form when permission is required.
3. Make access to information decisions based on the best interests of student safety in all instances.
4. Communicate to students and parents about the OSR and their access rights as follows:
 - i. Students or parents, once parental custodial rights have been confirmed (acquire and file a copy of the current court documents, where they exist, in the OSR), can examine the OSR under supervision by the principal or delegate so that content can be explained.
 - ii. Should parents or students request the removal or correction of a record, the principal will decide the request based upon the accuracy and date of the record, how the record assists in the improvement of instruction, what other policy obligations exist, and statutory retention requirements.
 - iii. Should the principal agree to remove or correct a record, both the OSR record and the electronic record (where it exists) must be equally adjusted.
 - iv. Should the principal disagree with the removal or correction of a record, the matter may be referred to the family of schools superintendent.
 - v. If the superintendent rules that a record should remain in the OSR against the wishes of a student or parent, allow a statement of disagreement to be attached to any record that a student or parent wishes corrected or removed.
5. Create and file in the OSR a notation of any copies taken of OSR content. Use Form OSR-6-OSR Copy Tracking Log.
6. Contact the school superintendent when served with a search warrant or a court subpoena, prior to complying.

D. Reviewing or delegate the review of the OSR to update and remove expired records:

1. At the end of each elementary division (primary and junior).
2. Upon transfer.
3. Prior to promotion to secondary school.

4. Five years post retirement before the OSR is transferred centrally to the Record and Information Management Office.
- E. Ensuring the confidentiality of the OSR is protected at all times and reporting breaches to Communication Services.
- F. Transferring single OSRs as follows:
1. Within the Board – upon receipt of a written request from the receiving school and using the Board courier system in a sealed envelope marked “confidential.”
 2. Outside of the Board to another Ontario school board – upon receipt of a written request from the receiving school and using a commercial courier.
 3. To a First Nation school, a federally or provincially operated school (a demonstration school), or a private school (inspected by the Ministry of Education) upon receipt of written requests from the receiving school and the parents and using a commercial courier.
 4. Out of Ontario – upon receipt of written requests from the receiving school and the parents, provide copies only. The original OSR must be retained.

And further,

- i. Record the transfer in the student information system.
- ii. Retain a record of the transfer for two full school years.
- iii. Transfer in hard copy form (do not fax or email).
- iv. Return an OSR to the sending school if the student does not arrive as expected.
- v. Do not transfer the Office Index Card. Retain for five years, filed by year of retirement and then transfer to Records and Information Management central storage.

G. Transferring of OSRs for Grade 8 transition to secondary school as follows:

1. In June, secondary schools send a list of students who have registered for September to feeder schools.
2. Elementary schools transfer the appropriate OSRs by the end of June.
 - a) The elementary school staff person will use the OSR Transfer label, filling it out completely and adhering one to each box.

- b) Regular board courier will be used to deliver the boxes.
 - c) The elementary school staff person will advise the contact at the secondary school once the boxes have been picked up for delivery.
 - d) The contact at the secondary school will confirm receipt of the proper number of boxes with the sending elementary school by email. The OSR boxes will be placed in a secure, locked room until records can be filed in the school's OSR cabinets.
3. OSRs of students who do not begin classes by Friday of the first week of school in September are returned to the elementary school to await an official OSR request from the secondary school at which the student has registered.

H. Education outside of the normal classroom setting:

1. When a student is actively enrolled in a PVNCCDSB day school and attends a Continuing Education program, the OSR remains with the PVNCCDSB day school. Information on credits completed is forwarded to the PVNCCDSB day school for inclusion in the Ontario Student Transcript (OST). The Continuing Education Program includes night school and summer school.
2. When a student has retired from a PVNCCDSB day school and registers in program of continuing education offered externally to PVNCCDSB, the program will request in writing that the OSR be transferred. Schools and Central Records will transfer the OSR and maintain a record of the transfer.
3. When a student is provided with instruction out of school; receiving home schooling, or is attending New Leaf (a program for suspended or expelled students), the school at which the student is currently or last enrolled is responsible for the management of the OSR. When the student reaches secondary school age, the elementary school will transfer the OSR to the secondary school that the parent declares the home schooling status to each year. The OSR shall remain at the school until five years post retirement, at which point it shall be transferred centrally to the Record and Information Management Office.

I. Overseeing the response to a lost OSR as follows:

1. Search thoroughly to confirm the OSR is lost.
2. Inform the parent/student of the loss and contact the Communications Manager.

3. Create a replacement OSR by:
 - a) Noting that this is a replacement OSR on the folder.
 - b) Referencing the Office Index Card for biographical data and completing the succession of schools attended.
 - c) Accessing the student information system for information for inclusion in the OSR.
 - d) Collecting special education and information from other sources in the Board.

J. In the event of a school closure;

1. OSRs for active students are forwarded to the school(s) where the students enroll.
2. OSRs for inactive students and Office Index Cards for all students will be sent to Records and Information Management central storage.

K. Collecting fees in accordance with the Fees Guide for Student Record Requests.

School Staff are responsible for:

1. Retaining and managing the content of each OSR in accordance with this procedure, the OSR Content Directory and as instructed by the school principal.
2. Ensuring the confidentiality of OSR content and maintaining OSRs securely.
3. Organizing retired OSRs chronologically by year of retirement in the school for five years. At the end of the five years, the OSR will be purged at the school and then transferred to Records and Information Management central storage for the remaining 50 years of legal retention.
4. When a student moves out of province, recording the last date attended and that the student “moved out of province” in the retirement section of the OSR jacket and in the student information system and print a final office index card.
5. When the right to access the OSR or other student information is uncertain, directing the requester to the school principal.
6. Providing support in the management of active OSRs.
7. Centrally storing inactive OSRs.
8. Shredding purged OSR content under the authorization of the school principal.
9. Returning an OSR to the appropriate school should a student re-enrol.
10. Auditing the management of OSRs.

Computer Technology Staff are responsible for:

1. Maintaining electronic student records.

Progress Indicators:

OSR Compliance Checklist

Definitions:

Ontario Student Record (OSR)

The Ontario Student Record is the official record required by the Ministry of Education that documents the educational progress of the student such as achievement results, credits earned, and other information important to the education of the student. It is a legal record that can be used for identification purposes.

It serves to guide instructional decisions and to provide the student, parents and educators with important information about the student's progress. For the purpose of access, the content of an OSR can be retained in paper and in electronic formats.

Active OSR

The official student record maintained at the school while the student is actively enrolled at that school.

Inactive OSR

The official student record retained by the school for five years after the student retires from school. Parts of the record are retained a further 50 years in Records and Information Management central storage. After 55 years, the records are destroyed under written authorization by the school principal.

Legal Guardian

A legal guardian is a person with legal custody of a person under the age of 18 which can be proven by the provision of a written court document. This includes biological parents where custody has not been revoked by a court of law; anyone granted legal

custodianship by a court of law such as Power of Attorney for Personal Care; and child welfare agencies staff where the student is their legal ward. Custody and decision-making responsibility means full right to make decisions regarding the child's health, education and welfare and to have access to their information maintained by the school.

Legal Name

A legal name is the full name given for the purpose of birth registration and which then appears on a birth certificate identifying a person for legal, and other official purposes. It includes given names (first and middle) and surnames. The legal name appears on all documents produced by the Board.

Repute Name

A repute name is one by which a person is generally referred. It is not a legally changed name and does not legally or officially replace a legal name.

Retired

A student is considered retired when they leave a publicly-funded school in Ontario. The OSR is retired when the student graduates, leaves Ontario, drops out of school or dies.

Demonstration School

Provincial demonstration schools are unique facilities for learning by deaf, blind, deafblind and/or severely learning-disabled students that are operated by the Ministry of Education.

Student Information System.

The board's electronic database containing student information and achievement data.

References:

- [Education Act R.S.O. 1990, Chapter E.2](#)
- [The Ontario Student Record \(OSR\) Guideline 2000](#), Ontario Ministry of Education

- [Municipal Freedom of Information and Protection of Privacy Act R.S.O. 1990, Chapter M.56](#)
- [Personal Health Information Protection Act S.O. 2004, Chapter 3, Schedule A](#)

Supporting Documents

Fees Guide for Student Record Requests

[OSR Content Directory](#)

[OSR Content Directory Quick Reference](#)

[Records Classification and Retention Schedule \(CRS\)](#)

Resources

[PVNC Records and Information Management Website](#)

www.ontario.ca/page/changing-your-sex-designation-your-birth-registration-and-birth-certificate

Forms

OSR-1 Consent to Transfer OSR

(located in custom report section of student information system)

[OSR-2 Consent to Share Information with Third Parties](#)

[OSR-3 Consent for Information Sharing- Students at the Age of Majority](#)

[OSR-4 Consent to Access the OSR](#)

[OSR-5 Request to Alter an OSR](#)

[OSR-6 OSR Copy Tracking Log](#)

[OSR-7 Declaration of Withdrawal from Parental Control](#)

Related Policy and Procedure

DP1200 Records and Information Management

AP1201 Records and Information Management

AP1202 Protection of Privacy

AP1207 Freedom of Information