

St. Catherine's Elementary School
20244 32nd Avenue,
Langley, BC V2Z 2E1



STUDENT RECORDS

Policy # 35

Rationale:

St. Catherine's School benefits from well-developed policies and procedures regarding student records which provide guidance for the collection, storage, use, disclosure, transfer, and protection of student information. Legal requirements and public expectations regarding the confidentiality, disclosure, and transfer of student records have increased, alongside growing societal concerns about responsible record management.

The [Independent School Act](#) (section 6.1), sections 9 and 10 of the [Independent School Regulation](#) (the *Regulation*), the [Student Records Order](#) (the *Order*) and the [Permanent Student Record Instructions](#) (the *Instructions*) provide a legal framework for student records.

Section 9 (2) of the *Regulation* requires independent school authorities to “establish and maintain record for each student and for each child registered with the independent school of the authority.” Additionally, “an authority must

- a) establish written procedures regarding the storage, retrieval and appropriate use of student records, and
- b) ensure confidentiality of the information contained in the student records and ensure privacy for students and their families.”

“An authority must permit a person providing health services, social services or other support services access to information in student records required to carry out those services.”

Scope:

This policy applies to all St. Catherine's employees, including persons who require access to information contained in a student record to support the planning and delivery of education, health, social, or other services.

Policy:

All School employees will follow St. Catherine's School's procedures for the collection of student information and its storage, use, disclosure, transfer, and protection.

Definitions:

IEP - Individual Education Plan as defined in *Ministerial Order 41/91*, the *Educational Standards Order*.

Inclusions – Documents (or copies of documents) that are used to help plan or support the individual student's education program. Not all students will have inclusions.

The following inclusions **must** be listed on form 1704 (PSR card):

- Health services information as indicated by a medical alert
- Support services information (e.g., psychometric testing, speech and hearing tests, adjudication requirements for completing assessment activities)
- Court orders as indicated by the legal alert
- Other legal documents e.g., name change or immigration document
- Notification that a student is on an Individual Education Plan (IEP)
- Notification that a student is registered as a Home Schooler

The following inclusions are considered optional and **may** be listed on form 1704 (PSR card):

- Records of information which an educator deems relevant to the educational program of the student
- Award information (Ministry awards information must include year, date, and serial number).

Permanent Student Record (PSR) – The Permanent Student Record consists of the following two parts:

- (i) Form 1704 (PSR card), and
- (ii) A minimum of the two most recent years of Student Progress Reports or a copy of the Transcript of Grades issued by the Ministry.

School of Record - Commonly used term for the school responsible for the Student Record and Student File as required under the *Permanent Student Records Instructions*. Each student has a single school that is responsible for maintaining and reporting the required records. When a student is cross-enrolled, unless the schools involved resolve it differently, the School of Record is the school where the student receives most of their educational program.

Student File – The physical or digital file for each student which contains copies of current records used in the planning and administration of the student's education program. The content of a Student File will differ with each individual student. However, at a minimum, the *Order* requires the Student File to contain the following:

- (i) all documents listed as inclusions on Form 1704,
- (ii) a document, in the form required by the inspector, verifying the information about the student's parent/guardian in respect of students eligible for funding,
- (iii) a copy of the student's current Student Learning Plan, if any, and
- (iv) a copy of the student's current IEP, if any.

Sensitive Information - Though the term is not defined in legislation, "sensitive information," from the perspective of independent schools, may include information which by its nature requires that school staff observe a high level of confidentiality. Examples information that could be seen as "sensitive"

- psychiatric reports;
- family assessments;
- referrals to or reports from school arranged counseling services;
- records of reports made under the Child, Family & Community Service Act or information that forms the basis of a child abuse report under this Act.

Procedures:

The Principal is responsible for the establishment, security and maintenance of the Permanent Student Record and Student File for each student enrolled in St. Catherine's School or registered as a homeschooler.

A Permanent Student Record and Student File will be created for each enrolled student and registered homeschooler at St. Catherine's School.

St. Catherine's School will consider consent regarding student information. Where consent to collect student record data is an issue, multiple 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(s)/guardian(s) in relation to collection of personal information about the student.

1. *Creation of Permanent Student Records and Student Files*

- a) St. Catherine's School will ensure the **required elements** are included in each Student File:
 - (i) Permanent Student Record (PSR) as per definition above
 - (ii) Minimum elements of a Student File as per definition above
 - (iii) Inclusions as per definition above.
- b) St. Catherine's School will adhere to the Ministry's ***Permanent Student Record Instructions*** for the completion of form 1704 (PSR card) for each student.

Form 1704 (PSR Card) Inclusions:

- (i) Documents listed as inclusions must be kept in the Student File and will be transferred if the student moves to another school.
- (ii) For all inclusions St. Catherine's School must list the document date, title, and expiry date or date rescinded (if applicable).
- (iii) If the space for inclusions becomes full, St. Catherine's School will create a second portion and attach it to the form for future additions.
- (iv) St. Catherine's School will indicate when a **Medical Alert** is in effect, and:
 - List the medical alert and the expiry date (if applicable) under the "Inclusion" section on the form 1704 (PSR card)
 - Attach an emergency procedure plan/medical response plan (if applicable)
 - The following medical alert conditions (if applicable) will be entered:
 - o diabetes
 - o epilepsy with a history of seizures in the past two years
 - o allergy (only those which produce an anaphylactic type of response, needing hospitalization and/or adrenaline at once by school staff)
See [*Anaphylaxis Protection Order*](#)
 - o blood clotting disorders
 - o serious heart conditions
 - Any other condition which may require emergency care may be added after consultation with the senior public Health Nurse, supervisor, or Medical Health Officer.

- Situations that may interfere with student performance, health or behaviour will be included: i.e., hearing aids, medication prescribed by the doctor (asthma, hyperactivity), cerebral palsy, cystic fibrosis.
- Students in Kindergarten to Grade 3 with **severe** allergies to substances found in St. Catherine's School environment that require preventive and/or treatment action by school staff should be included.
- A parent/guardian will inform the school of any medical alert pertaining to their child. Then:
 - The parent will provide the school with any important information to keep on file;
 - The parent will then provide the school with necessary medications their child might need, as well as instructions for administering;
 - The school keeps medications and instructions in a locked cupboard;
 - Medications (e.g. epipens, allergy medications) are taken on field trips;
 - Staff are given a document showing which students in the school have medical alerts, with these documents updated when needed.
 - We have a CISVA policy that we follow with regards to the above, called the [Anaphylaxis Policy](#)

(v) St. Catherine's School will indicate when a **Legal Alert** (Court Order is in effect), and:

- List the court order and the expiry date (if applicable) under the "Inclusion" section on Form 1704 (PSR card) (e.g., custodial rights, restraining orders, instructions re: access to student and/or student records).
- When a court order is no longer in effect enter the date the order was rescinded in the expiry space.
- Is there a legal alert, a parent will note this in the appropriate section on the registration form. We are provided with any court ordered documents that are needed at our end, and we follow up with the parent as needed.

(vi) St. Catherine's School will indicate **Additional Required Inclusions**, and:

- List any of the following documents and expiry date (if applicable) under the under the "Inclusion" section on Form 1704 (PSR card)
 - o Support services information (e.g., psychometric testing, speech and hearing tests, adjudication requirements for completing assessment activities)
 - o Other legal documents (e.g., name change or immigration documentation)
 - o Notification each year that a student is on an Individual Education Plan (IEP)
 - o Notification each year that a student is registered as a Home Schooler.

(vii) St. Catherine's School may list the following **optional inclusions** on Form 1704 (PSR card):

- Records of information which an educator deems relevant to the educational program of the student

- Award information (Ministry awards information must include year, date, and serial number)

(viii) **Student Progress Reports** and **Student Learning Plans** will be kept in the Student File but are **not** to be listed on the PSR form in the inclusion section.

c) St. Catherine's School will ensure the **required items in respect to student eligibility for funding** are included in each Student File.

- (i) verification of the student's name(s), birthdate, and placement data
- (ii) verification of the official name(s) of parent(s)/guardian(s) and that at least one parent or guardian is lawfully admitted to Canada and is ordinarily resident in British Columbia if funding will be claimed.

Acceptable documents for verification include:

- (i) a copy of the parent/guardian's Canadian birth certificate, or Canadian passport, or permanent residency card, or work permit or study permit, or documentation from CI (for being lawfully admitted to Canada).
- (ii) a copy of the parent/guardian's BC driver's license or utility bill (for being a resident in BC)

St. Catherine's School will retain a copy of the parent/guardian's documents.

d) St. Catherine's School may include **optional elements** in the Student File; such as:

- (i) student registration form
- (ii) care card number
- (iii) emergency contact numbers;
- (iv) doctor's name and contact information;
- (v) allergies, medication and/or other health concerns (other than those required to be listed on Form 1704 (PSR card);
- (vi) previous Student Progress Reports (other than the two most recent years required);
- (vii) serious student discipline reports (e.g., copies of letters to parents/guardians regarding discipline matters and corrective actions taken);
- (viii) reports of important meetings/discussions relating to the student;
- (ix) standardized test scores;
- (x) *Sensitive Student Record Information*

When sensitive information is placed in a school record, St. Catherine's School will consider the following handling procedures:

- obtain parental consent for collection, use, and disclosure of psychiatric reports and family assessments (written, dated and signed consent is best);
- store where only the Principal or persons authorized by the Principal can access such information; and/or
- disclose or transfer only according to law or with parent/guardian consent.

The guiding question to determine whether optional information should be included in the Student File will be: "Is this information necessary or clearly helpful for educators working in the best interests of the student?" Information that does not meet this criterion but is required for other purposes will be maintained separately from the Student File in an appropriate and secure location.

All optional elements in a Student File will indicate the date and year when the record was created.

- e) Records of reports made under the Child, Family & Community Service Act or information that forms the basis of an alleged child abuse report under this Act are not part of the Student File and will be maintained separately. Teachers are asked to document and store, in a secure location, any information that was brought to their attention, and then we follow any protocols set out in the [CISVA Policy - Responding to Student Abuse and Neglect](#).
- f) Counselling files will not be included and/or placed in a Student File. Counselling records, instead, are kept in a separate file as part of a student's IEP.

2. *Currency and Format of Student Records*

Student information will be updated as it changes as the student progresses through St. Catherine's School. The Principal or a designate will be responsible for updating and ensuring the accuracy of form 1704 (PSR card) with its inclusions. Such updates will take place upon receipt of new or revised information regarding required inclusions (including immediate updates for Legal and Medical Alerts); at the end of each school year for Achievement/Attendance information; before required Student Records are transferred to another school; and when a student graduates or leaves the BC education system. A completed, current form 1704 (PSR card) will be in every student's Permanent Student Record, or available to be printed from St. Catherine's School's Student Information System.

Data for form 1704 (PSR card) may be stored in electronic and/or paper format. If form 1704 (PSR card) data is stored in electronic format, St. Catherine's School will be capable of recreating the data in case of a system failure. If St. Catherine's School does not use the Ministry's form 1704 (PSR card), and develops its own, St. Catherine's School's version will represent the same fields in the same format as on the Ministry's form 1704 (PSR card).

3. *Storage and Retention of Student Records*

a) Storage

- (i) Student Records will be stored securely and in a manner that ensures the record's preservation from calamity (fire, flood, etc.).
- (ii) Where all or elements of Student Records are only stored digitally, St. Catherine's School will ensure secure storage and the ability to retrieve student information in the case of a system failure.

- (iii) Where elements of a student's file exist outside the Student File, the Student File will indicate there are additional elements securely stored elsewhere in St. Catherine's School (i.e., IEP stored in the Inclusive Education office).
- (iv) Student Records will be maintained in a manner that ensures the confidentiality of information to ensure privacy for students and their families, and compliance with the *Independent School Act* and the *PIPA*. Furthermore, as per Section 34 of the *PIPA*, St. Catherine's School will protect personal information from unauthorized access, collection, use, disclosure, copying, modification, or disposal, or similar risks.

b) Retention

- (i) The Permanent Student Record (PSR) will be retained for all students for which St. Catherine's School is the "School of Record" until another BC school requests it or for 55 years after a student has withdrawn and not enrolled in another school or graduated from St. Catherine's School. St. Catherine's School may choose to store all PSRs digitally. In doing so, St. Catherine's School will ensure secure long-term storage and the ability to retrieve student information upon request. A digital PDF is considered "printed."
- (ii) If a student withdraws from St. Catherine's School or enrolls in another BC school, St. Catherine's School will, upon request from the enrolling school, transfer the Permanent Student Record, the current Student Learning Plan, if any, and the current IEP, if any.
- (iii) Non-transferred student records and/or items not required to be retained will be returned to the student/parent, securely destroyed, or retained by St. Catherine's School only to the extent required by law or needed for legal, administrative, and/or operational purposes. When the retained items are no longer needed for these purposes, they will be securely destroyed.

1. ***Examination of, Access to, and Disclosure of Student Records***

St. Catherine's School will ensure confidentiality of information contained in student records and maintain privacy for students and their families in accordance with the requirements of the *PIPA*. While disclosures may be made to parents/guardians regarding their children/students in accordance with the *PIPA*, disclosures will not be made that would reveal personal information about other individuals.

- a) A student (capable of exercising their *PIPA* rights) and parents/guardians of a student will be permitted (unless restricted by a court order) to:
 - (i) receive a copy of any student record.
 - (ii) 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. Prior arrangement shall be required in order to give the Principal adequate opportunity to arrange for the examination of the student's record.

A non-custodial parent who is not a guardian may attain access to their child's student records only if:

- (i) the custodial parent has consented in writing; or

- (ii) the non-custodial parent who is not a guardian is granted access to the student records by court order.

If School officials are unsure as to the legal entitlements of the non-custodial parent who is not a guardian or if there is serious conflict between the parents with respect to student record requests, then St. Catherine's School officials may consider seeking legal counsel.

Graduating students will be provided with interim and/or final transcripts of Grades 10, 11 and 12 courses and marks upon request of the graduate. Copies will be sent directly to institutions of higher learning when requested by the student. Summaries of students' school progress may be provided to prospective employers upon the written request of a former student.

- b) Under section 9 of the *Independent School Regulation*, St. Catherine's School must permit access to a student's records to a person who is planning for the delivery of, or delivering, health services, social services or other support services to that student. Subject to any other legal authority or requirement that authorizes or requires disclosure, any person who receives information from a student record, must not disclose that information to any other person except for the purposes of delivering or planning the delivery of the services referred to above.
- c) Copies of student progress reports, academic transcripts and statements of standing may be provided to other parties where a written request has been made by a parent/guardian, legal representative of the student, or by the student if they are a mature minor or an adult. However, copies of documents requiring interpretation shall not be provided to other parties except where the Principal has granted permission or where the release of such records is required by law (e.g., court order, subpoena).
- d) St. Catherine's School may grant access to student records to the extent necessary to meet any claims being made against the insurance provided to St. Catherine's School by that insurer. Such records are released on the understanding that the person receiving such information shall not disclose it except for the purpose intended.
- e) School employees will access student records on a 'need to know' basis only in order to fulfill the duties of their position. Board Authority members/directors shall not access personal student information without consent of the student's parent/guardian.
- f) Records of reports made under the Child, Family & Community Service Act or information that forms the basis of an alleged child abuse report under this Act will be retained only for the purpose of the child protection services or proceedings. This information will not be disclosed to parents/guardians, third parties or transferred to other schools unless directed to do so by a child protection worker. Such reports are strictly confidential and will be stored where only the Principal or people authorized by the Principal can access them.

5. *Transfers of Student Records*

St. Catherine's School will adhere to the requirements for transferring Permanent Student Records established by the Ministry of Education and Child Care.

- a) Upon request from the enrolling institution, St. Catherine's School will transfer the Permanent Student Record, consisting of Form 1704 (PSR card), and the two most recent years of Student Progress Reports or a copy of the Transcript of Grades issued by the Ministry; the current Student Learning Plan, if any, and the current IEP, if any, for a student, to the BC independent school authority or BC public school board where the student is enrolled.
- b) Where a former student is enrolled with an educational institution outside of the Province St. Catherine's School will transfer the current Student Learning Plan, if any, the current IEP, if any, and a COPY of the Permanent Student Record of the student to the enrolling institution.
- c) If St. Catherine's School permanently closes, St. Catherine's School Authority will take responsibility and provide for arrangements to ensure that the required Student Records are transferred to the receiving schools in which students will be enrolled. In the event that a student will be homeschooled, the required Student Records will be transferred to St. Catherine's School registering the child as a homeschooler. Within 60 days of the closure of an independent school, St. Catherine's School Authority must transfer to the inspector the Permanent Student Record of any student that has not been forwarded to another authority or board in British Columbia.

Additionally, as matters of good practice, St. Catherine's School will adhere to the following practices:

- d) A tracking system will be maintained by St. Catherine's School for the purpose of recording all Student Record transfers. The tracking will consist of the date of transfer, student name, date of birth, Personal Education Number (PEN) and destination.
- e) Before a Student Record is transferred, the Principal or designate will review the Student File, and any information that is not legally required to be transferred will be removed, unless a parent/guardian has consented for an additional item(s) to be transferred.

Reference(s): • Independent School Act • Independent School Regulation (the <i>Regulation</i>) • Student Records Order (the <i>Order</i>) • Permanent Student Record Instructions (the <i>Instructions</i>) • Personal Information Protection Act (the <i>PIPA</i>)	Approved by: St. Catherine's Parish Education Committee Date Approved: September 1, 2026
Cross-reference(s): • Anaphylaxis Policy • CISVA Policy Responding to Student Abuse and Neglect	Date(s) revised: Summer 2026

- Privacy Policies
- Counselling Policy
- Child Abuse Prevention Policy

	PERMANENT STUDENT RECORD – PSR (TRANSFERABLE)	ADDITIONAL STUDENT FILE ITEMS (NON-TRANSFERABLE)
Required Elements	1. 1704 with list of inclusions (if any) 2. Student progress reports (most Recent 2 years or transcript) 3. Copies of inclusions (if any) • Health services information in reference to the ‘medical alert’ checkbox • Court orders in reference to the ‘legal alert’ checkbox • Support services information (psychometric assessments, etc.) • IEP (if any) • SLP (if any) • Notification of a student being homeschooled	1. Student Legal name 2. Official names of parents or guardians and contact information 3. Parental/guardian legal Residency in BC
Optional Elements (Not required for the Student File but are likely needed for legal, educational, operational, or administrative purposes.)		<i>Examples only, not meant to be a complete list of optional items</i> 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 12. Standardized tests 13. Records of information relevant to student's educational program 14. Awards and /or certificates
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a) Eligible for the per Student Grant Information

Group 1 and 2 Independent School Grants

The following information may be helpful to schools, school authorities and school auditors attempting to verify eligibility of certain students for provincial operating 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

Sample Student Registration Form sections to verify qualifying student status are attached as Appendices b) and c). These samples will meet Independent School Act requirements for funding eligibility and require minimal collection of personal and/or original documents by St. Catherine's School.

NOTE: As long as St. Catherine's School has verified that at least one parent/guardian is lawfully admitted to Canada and a resident of British Columbia, the suggested forms below are not required. St. Catherine's School may choose to retain a copy of the parent/guardian's Canadian birth certificate, or Canadian passport, or permanent residency card, or work permit or study permit, or documentation from CIC. As to residency, evidence of a BC home address could be a BC driver's license or utility bill.

b) Residency Form A (for parents/guardians)

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:

Parent/Legal Guardian's name:

Parent/Legal Guardian's signature:

Date: _____

c) Residency Form B (if parents/guardians are deceased)

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

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: _____