

B R I E F

to

THE MINISTER OF EDUCATION

regarding

THE CUMULATIVE SCHOOL RECORD

(Order in Council #2284-73
of June 20th, 1973)

presented by

QUEBEC FEDERATION OF HOME & SCHOOL ASSOCIATIONS

4795 St. Catherine St.W. Montreal, Que.

March, 1974.

The Quebec Federation of Home & School Associations, representing over 12,000 families who are members of local associations in schools or groups of schools, in preparing this Brief has received comments and assistance from associations on the Island of Montreal, the south and north shore, Quebec City, Hull, Gaspé and the Eastern Townships and also from a number of school committees.

We submit that the welfare and progress of children in the school system is paramount and that all Regulations and procedures must be of benefit to the children. The objectives of record-keeping or analysis of these records must be subservient to the welfare of the pupil.

With this philosophy in mind our Federation has reviewed the Regulation and the comments and submissions on the Cumulative School Record covered by Order in Council #2284-73 which have been surprisingly unanimous.

Parents are concerned because this Order which covers the collection and storage of information about our families, our children - the pupils, their performance, their achievements and their assessed characteristics, is unnecessarily wide and is an invasion of family and personal privacy.

Furthermore we believe that to collect such a wide range of personal information as well as annual performance and achievement statistics will in no way achieve the objectives claimed in Section 5

of the Regulation. In fact we suggest that the objectives quoted in the Regulation maybe best served by short term storage of much of this data.

We welcome the introduction of a formal system for the evaluation and recording of school pupils' achievements. School Boards have a legitimate need to know and retain certain facts (but facts, not opinions) about pupils.

The question is what data do school personnel really need to have to educate our children, how it is to be retained or stored, for how long and with what accessibility. We are firmly convinced that any acceptable system must meet the following criteria:-

The system must be:

1. Simple to Operate
2. Open, yet Confidential
3. Fair and Objective - not Subjective
4. Organized to take account of the transitory nature of the data collected
5. Administrationally not cumbersome nor expensive to administer.

Considering these items in turn:-

1. Simple to Operate - The system might consist of two parts -
 - (a) an office record card (see Appendix I), and
 - (b) an envelope or folder which would follow the pupil throughout his school career.

The intent of (a) is so that school staff should not have to go to a special vault and extract the permanent record to get

a telephone number in an emergency. The design of (b) would enable permanent data to be entered on it and short term data to be stored in it.

2. Open, yet Confidential - The school board must be required to explain annually its policy regarding availability of the record to parents. Also the non-teaching persons authorized to consult it must be identified in the Regulation. Openness might be achieved by having the parent initial the record annually during the school career. Entries on the office or emergency record card regarding medical or similar problems together with details of emergency treatment should only be made in consultation with and in front of parents.

It is the fundamental right of parents to request revision or deletion of any out of date, incorrect or irrelevant data. In the Regulation the school principal is the final arbiter, however this is insufficient; parents must have the right to appeal to the School Board and ultimately to the Minister (or his designate) regarding any entries in the record. The confidential nature would not permit disclosure of contents of the card or file to others without the written permission of parents and no information should be used for research without its complete anonymity being ensured.

The Regulation should specify standard routines to cover the destruction of all purged documents and also any

copies made by any process of all or any parts of the file.

The confidential nature of the records is most important in this age of computers - the risks of abuse are very real and great precautions must be exercised to ensure that this security is not breached by abuse or carelessness.

School Board employees and officials should receive mandatory training regularly in the security regulations so as to reduce as far as possible any attempts to circumvent or defeat the system.

3. Fair - Any entries made should be signed so that the teacher can be identified - too often people are judged to their detriment, on the basis of an unsupported or untraceable subjective comment. Only positive entries should be recorded i.e., only results in subjects passed but not failures. No data should be recorded that in any way may jeopardize the pupil.

All comment should be objective and stored temporarily not for the duration of the permanent file.

4. Organization - Taking account of the transitory nature of the data being collected would require that all data classified on a "time span-relevancy" basis and purged accordingly.

We believe that the Record System should contain mandatory provisions for regular (say biennial) clearing of all irrelevant data. One might ask of what use is the recording

of Grade II performance and evaluations beyond the Grade V level. The problems of most children are short-lived and should never remain part of a permanent record.

It should not be forgotten that research indicates that the teacher's level of expectation of a child has a direct relationship to his performance. Therefore, the mere fact of recording a problem ensures that it may remain with the child.

Besides their questionable accuracy in the first place, behaviour and personality evaluations change. It is far too easy to misinterpret or, worse, misuse information that is invalid or no longer applicable. The dangers can only be compounded by storing these data and evaluations in a permanent record or memory bank. It is questionable whether some of this information should even be collected. However, people do collect this type of information and the fact must be recognized so as to identify it - limit its use and hasten its destruction.

The following classifications are suggested, with review periods for the purging of the data:-

- (a) Temporary (or Scratch Pad)
- (b) Short term
- (c) Long term.

- (a) The Temporary Record memory, which would include the office record card should be reviewed annually and all irrelevances eliminated. Other relevant data might be transferred to short term storage but this should be severely limited.
- (b) The Short Term Record or memory should be reviewed at least biennially so as to eliminate all unnecessary data. All the Elementary School sections of this record should be wiped or destroyed after completion of Secondary I, and the Secondary School sections deleted at the end of the pupil's school career. Any data needed for research and analysis should be transferred from this record to a statistics file on a strictly anonymous basis for use without the identity of the pupil being traceable.
- (c) The Long Term or Permanent Record should contained ONLY:
- Identity of pupil and schools attended with dates
 - Scholastic achievements for no more than the last three years of the school career
 - Other data such as scholarships, bursaries etc. awarded to the pupil.

We categorically oppose the recording of data on family life, citizenship, religion and subjects of similar nature or personality evaluations which by their very nature are of questionable accuracy and should not appear in a child's dossier.

During this century occasions have arisen in the world where the mere recording of religion or nationality was sufficient to categorize a

a person and perhaps condemn them to a concentration camp. It must be remembered that memories are long and vivid and many people feel threatened by the collection, without just reasons, of this type of data. Their reluctance to provide it is an expression of their fears for themselves and their children.

The Regulation indicates that religion is recorded necessarily in a confessional system, whilst we support the confessional system, there are better ways to ensure that tax monies are credited to the appropriate system.

5. Administration - The system proposed is cumbersome and will be a financial burden upon taxpayers. We believe that the use of one and only one form for the whole of the scholastic career (be it a file, folder or envelope and subject to pruning at regular intervals), with only the items listed earlier being retained in a permanent record, would reduce the costs being imposed probably to at least one half. How much more preferable it would be to spend the savings on more teachers or teaching aids or facilities such as language laboratories etc. We believe that the requirement for separate elementary and secondary files is based upon the needs of areas where separate Boards administer elementary and secondary schools. It is our contention that the retention by the elementary school or board of the office record card, (Appendix I) would be sufficient for all statistical or budget purposes and enable the permanent record to follow the pupil to the secondary school. Any data collected for statistical purposes can only reach its full value if followed by appropriate diagnostic and therapeutic services.

A comprehensive analysis of the pertinent sections of the proposed Regulation has been made and in Appendix II the proposals for the classification on the "time relevancy basis" and deletions or additions have been made together with some comments regarding our proposals made on the subject items. This Appendix supplements our commentary left with the representatives of the Minister at the working session on February 7th, 1974, and we shall be pleased to meet again with these representatives to further discuss and explain our position.

In closing, we reiterate that we are not entirely happy with the Departmental proposals for Measurement and Evaluation, but we propose to comment on these separately.

In addition, we are also seriously concerned about the volume of data which universities both in Quebec and externally appear to require before the entry of a pupil to that university or college may be considered. We feel that a separate study should be made so as to ensure that all unreasonable demands may be resisted.

WILLIAM I. MILLER, Q.C.,
President

Mrs. E. O'Connell
Executive Vice-President

John Goodchild
Vice-President.

March, 1974.

APPENDIX I

OFFICE EMERGENCY RECORD CARD

SCHOOL CODE _____ NO _____

PUPIL _____
Surname Initials 1st Name Sex
Q.H.I.

BIRTH DATE _____ CODE _____
S.I.N.

RESIDENCE _____
OF PUPIL _____

*PARENT/GUARDIAN/FOSTER PARENT _____ Tel.No _____

EMERGENCY TEL.NO. (1) _____ (2) _____

FATHER'S NAME/GUARDIAN _____

ADDRESS _____

<u>YEAR</u>	<u>GRADE</u>	<u>ROOM #</u>
19		
19		
19		
19		
19		
19		
19		

*Delete as appropriate

EMERGENCY HEALTH DATA

Note: Data on Health problems and treatment must be entered here in front of, and signed by the parent

When pupil leaves school remove this portion and destroy - See Regulation #...

PARENT'S SIGNATURE _____
DATE _____

APPENDIX II

CUMULATIVE SCHOOL RECORD

SECTION 4

a) i (Compulsory)

Permanent	A. Surname and Given Name
	C. Sex
	D. Code
	E. Birth Date - Add Q.H.I.No.
Short Term	F. Language of Instruction
	G. Native language of pupil
Scratch Pad (Yearly)	B. Address
Deletion	H. Religion
Addition	Quebec Health Insurance No.

REASON - COMMENTS

- B. For benefit of transients.
- F. Parental choice of language instruction. Permits mobility between French and English systems
- G. Only beneficial to the child until he has become proficient in the language of the school.
- H. Delete unless requested by parents. Religion is a personal family decision.

ii (Optional)

Scratch Pad (Yearly)	A. Phone Number
Deletion	B. Emergency Phone Number
	C. Citizenship

REASON - COMMENTS

- A. & B. Emergency information to be readily accessible. Subject to frequent change.
- C. Irrelevant to school achievement.

(ii)

SECTION 4 (continued)

b) i (Compulsory)

Short Term

- A. or B. Mother or Father's Name
- C. Names of person with whom pupil resides and their family relationship.
- D. Names, addresses and phone numbers of person with legal custody.
- E. Names, addresses, and phone numbers of foster parents.
- F. Language spoken at home.
- G. Parent deceased.

REASON - COMMENTS

- A. or B. If 'data twinning' a problem, refer to Q.H.I. or S.I.N.
- C. D. E. Unnecessary clerical work. Should be on Emergency Record Card only.
- F. & G. Of no benefit to child outside of school

b) ii (Optional)

Short Term
Deletion

- Order in Family
- B. Occupation of Father & Mother or Guardian
- C. Schooling of Father & Mother or Guardian

REASON - COMMENTS

- B. & C. Evaluation of child should be based on his or her own merits and interests.

SECTION 4 (continued)

c) i (Compulsory)

Permanent	B-1 Year B-4 Attendance B-6 Scholastic achievement
Short Term	A. Kind - general evaluation B-2 Age group B-3 years of schooling B-7 results of Department tests B-8 Temporary code - school and school board
Deletion	B-5 Characteristics of group and sub-group
Addition	Name of teacher responsible for student. Emergency Health treatment - critical to the welfare of a child who requires instant medical attention. Not to be included in permanent file but under constant review in 'short-term' office record file.

REASON. - COMMENTS

- A. Assessment of questionable value. Useless anyway after 2 years.
- B.-6 Record only the subjects passed or those in which pupils progress has been satisfactory with teacher's name.
- B.-2.3.7.8. Not of permanent value to pupil and should be eliminated after Section 1.
- B.5 Danger of labelling or mis-interpretation of same which could be damaging to child's self-image or could affect the teacher's expectations.

Permanent	C-1 Year C-2 Years of schooling C-3 Attendance C-6 Results of courses C-7 Results of Department examinations C-8 Credits (Department of Manpower)
Short Term	C-5 Results of Department tests C-9 Code, schools and School Board
Deletion	C-H Characteristics of Group C-6 Courses taken
Addition	C-6 Courses passed C-7 Add after Departmental Exams "...passed".

REASON - COMMENTS

- C.5 & 9 Not valuable to child after Secondary V
- C.-6 Results only of courses passed should be recorded
- C.-7 Results of Departmental exams -only subjects passed to be recorded
- CD-H Danger of labelling which could be damaging to child's self-image - level of expectation has direct relationship to his achievement

SECTION 4 (continued)

c) ii (Optional)

Short Term	A. Kind - assessment
	B-1 Quintile rank
	B-2 Averages
	B-3 Stages completed
	B-4 Methods used
	B-5 Board Tests
	C School Board Assessment Tests

REASON - COMMENTS

A. Assessment of questionable value, useless after 2 years
B-1-2-3-4-5 To be destroyed after Section I. Retention not
beneficial to child.

d) Student Activities (Compulsory)

Deletion Student Activities

REASON-COMMENTS

No coded assessment, but there must be some way in which credit should be given to students who show qualities other than academic achievement. Consequently, we feel this an area needing further comment after study on Measurement and Evaluation.

e) Consultations with non teaching professional personnel (Compulsory)

COMMENT

In no way must records or reports of consultations become part of a personal file to which teacher or parent/guardian does not have access and security equal to that ensured for the cumulative school record. Such material must be destroyed immediately when the student leaves school. Duplication or transfer not permitted without written consent of parents.

SECTION 4 (continued)

F) Physical Fitness (Compulsory)

COMMENT

Essential that physical development screening be handled by professionally trained personnel, or not at all. This could serve a much needed diagnostic service in the primary years, but follow-up services must also be provided.

g) Behavioural Observations (Optional)

Short Term	Positive comments only, if at all.
Deletion	Behavioural observations.

REASON - COMMENTS

Subjective. Too difficult to assess - Questionable approaches to assessment. Reserve right to further study. Only positive comments to be considered, if at all.