



# CONFIDENTIALITY OF STUDENT RECORDS POLICY

## 1. Policy

With personal and academic data in its possession, Hanson Private Career College (hereinafter 'Hanson') has the obligation to protect an individual right to privacy as described in the Freedom of Information and Protection of Privacy Act (FIPPA), 1990. Therefore, it must regard each student record as a unique, private document to which access is strictly controlled and governed essentially by the student's wishes and the college's responsibility.

## 2. General Guidelines: Release of Information

- 2.1. The basic guideline governing the release of information is based on the belief that the college acts with discretion upon authorization from the student.
- 2.2. Students will sign a Student Consent Form that gives the college authorization to access their file.
- 2.3. In response to third party inquiries, therefore, only what is public record may be released, namely whether or not the student is currently enrolled and the date when the certificate/diploma was awarded.
- 2.4. No further information will be released without student authorization. This applies typically to requests from family members, prospective employers, police forces, credit bureaus, finance and loan companies, private investigation agencies, banks, and similar organizations. Such requests should be referred to the college.
- 2.5. External requests for a mass listing of directory information, typically from credit card agencies, will be denied.
  - 2.5.1. Where such listings have in-house legitimacy, such as the facilitation of student elections, they may be released without discretion.
- 2.6. The original documents of a student file will not leave the college; appropriate copies may be released to deans when necessary.
  - 2.6.1. There are two exceptions:
    - This rule is superseded by law in the case where a court subpoena is in effect (see Section 6: Access by Third Parties outside the College) and
    - Where an authorized search warrant is served.
- 2.7. Regulations and records of attendance in post-secondary courses are incorporated into the grading policy of each course.
  - 2.7.1. It is the professional responsibility of faculty to assess grades and the degree to which attendance plays a role in the assessment. Therefore, requests for records

of attendance, typically from sponsoring agencies, are considered inappropriate and are to be referred to the college.

### **3. Academic Records and Student Information**

- 3.1.** The college is accountable for gathering and maintaining accurate data from students and agencies and is responsible for providing appropriate information, on request, to the student or those persons or institutions designated by the student.
- 3.2.** The college is the official repository of Hanson student files and records; therefore, all requests for information regarding students should be routed through it.
- 3.3.** Access to student information through electronic methods must be controlled through conscientious use of technology and adherence to the user guidelines provided by the college. Typically, these will address screen layouts, security codes, and general procedures.
- 3.4.** With both manual and computer-based records, students are assured of the following principles:
  - 3.4.1.** Data on the automated records system is available for their perusal, as is their file, under the supervision of the college.
  - 3.4.2.** Data is used by Hanson only, for record-keeping, reporting, and analysis purposes.
  - 3.4.3.** Data is updated, corrected, or amended upon notification and/or request, as appropriate.
  - 3.4.4.** Data is protected.
  - 3.4.5.** Data is maintained live only as long as is useful, after which time it is converted to a storage medium.
- 3.5. Contents of the Student Record**
  - 3.5.1. Current Student Record**
    - 3.5.1.1.** Application form and its documentation and admissions correspondence;
    - 3.5.1.2.** English Proficiency Test; confirmation of completion and status;
    - 3.5.1.3.** Receipt of payment of fees;
    - 3.5.1.4.** Record of changes of status (i.e. name change, address change, grade change);
    - 3.5.1.5.** Record of withdrawal;
    - 3.5.1.6.** Upon completion of course(s), a copy of the student's report card and certificate of completion.

**3.5.2. Permanent Student Record**

**3.5.2.1.** Two (2) years after a student leaves the college, only the following documents will comprise the permanent student record:

- Student Transcript (cumulative academic record)

**3.6. Maintenance, Storage, Retention, and Destruction of Records**

**3.6.1.** Hanson operates the maintenance, storage, retention, and destruction of student records.

**3.6.2.** Student records will be stored in a secure manner consistent with the confidential nature of the information involved.

**3.6.3.** Pursuant to the *Private Career Colleges Act, 2005*, private career colleges (PCCs), including Hanson, will make transcripts available to students for at least 25 years after they leave the college.

**3.6.3.1.** Hanson will transfer student transcripts to a secure, off-site facility that is approved by the Superintendent, PCC, within 90 days of the student leaving the college.

**4. Access by the Student**

- 4.1.** Upon request, each student may access their file, request its release to a third party, or request it to be held with no release allowed.
- 4.2.** At the same time, the college may hold back the release of the record of a student who has debts outstanding to the college.
- 4.3.** Unless unusual circumstances prevail, no grades or certification shall be released by the college to an individual student before the official release of grades and certification to all students.
- 4.4.** Final grades are not official until records and released by the college. If faculty wish to post grades, they must identify students by means other than name or I.D number and specify that such grades are unofficial.
- 4.5.** Generally, the practice of posting student grades or evaluations results by student name, student number, or any other identifying symbol or code is strongly discouraged.

**5. Access by College Personnel**

- 5.1.** Faculty, counselors, and administrative officers of the college who have a legitimate requirement for the material of the record will be permitted access to the appropriate files.

- 5.2. If there is any question regarding the legitimacy of the request, it will be clarified by consultation with the college for Freedom of Information and Protection of Privacy.

## **6. Access by Third Parties Outside the College**

### **6.1. Sponsoring Agencies**

- 6.1.1. Sponsors or employers paying fees on behalf of students are entitled to access to or release of student records or information contained therein only upon student's authorization.
- 6.1.2. Exceptions to this policy (in response to unique requirements or legislation) may be determined only by the college in consultation with the college for Freedom of Information and Protection of Privacy, when appropriate.

### **6.2. Government Agencies**

- 6.2.1. Properly identified representatives of federal, provincial, or local government agencies, including local police, O.P.P., and R.C.M.P. will be treated like any third party; that is, student authorization must accompany their request for information (an exception to this is if the information is to aid an investigation undertaken with a view to a law enforcement proceeding is likely to result – FIPPA allows disclosure in this instance).
- 6.2.2. If in the opinion of the college, however, denial of information could involve hardship to the student, appropriate details may be released.
  - 6.2.2.1. Typically, this would involve notification of family death, search for legatees, and so on.

### **6.3. The Courts**

- 6.3.1. In the events that a student record is subpoenaed by the court on behalf of the student, a certified copy of the full student record will be offered.
- 6.3.2. Should the record be subpoenaed by a party other than that representing a student, a certified copy of the record will be offered to the judge alone, with an explanation of the college's reluctance to release a private document without student authorization.
- 6.3.3. The decision will then rest with the judge as to the disposition of the record.

### **6.4. Researchers**

- 6.4.1. Requests from researchers making statistical studies must be approved by the Vice President, ON or designate under conditions that protect the student's privacy and guarantee the anonymity of the data collected.