



<b>Category:</b> Administration	<b>Responsible Owner:</b> VP Operations	<b>Effective Date:</b> January 2, 2018 – revised December 2, 2024
<b>Policy Number:</b> 1.5	<b>Approval Body:</b> Board of Governors	<b>Policy Name:</b> Student Records and Privacy Policy

**POLICY:**

**PURPOSE/COMMITMENT:** The purpose of this policy is to establish the principles and procedures relating to privacy of information. All personal information is collected under the authority of 26© of the Freedom of Information Act, R.S.B.C. 1996, c165.

**SCOPE:** The policy applies to all members of the Columbia College community.

**DEFINITIONS:**

n/a

**Category:**

1.0 Administration

**PROCEDURES:**

**Privacy**

In the past College policy was that each student attending Columbia College had his/her own paper file. The file contained transcript and other documents such as copies of letters for Study Permit extensions and so on. Files were kept in the Records Room at the rear of the Administration Office; access to this room was limited to office staff, administrators and counselors (and occasionally janitorial staff). Access to student files was limited to those with a “need to know”. Instructors were not permitted access to student files; if instructors had a question or concern about a particular student they talked to a counselor or the Principal/Vice Principal.

Student files are now electronic, and similar restrictions apply to electronic files. The same information is retained. The College’s Student Records System is designed to provide access to student records only to those who need to know. Administrators and counsellors with access to student files through their computers are expected to protect students’ privacy – offices should not be left open and unattended at any time, but certainly never when the computer is connected to the Student Records System.

**Access to Information**

Information on students is protected by Privacy Regulations, and requests for personal information from phone companies, landlords, etc, is normally denied. Information may only be released to parents/guardians if the student is in a High School Program\* and is under that age of 19, or if the student signs a release form.

Requests for information from IRCC or Police Forces are generally accepted; legal advice (some years ago) was to require Police to obtain a warrant if they want information, but our policy has generally been to cooperate with Canadian authorities. Columbia College does not provide personal information to the authorities of other countries, even if the request comes from a Consulate we have regular dealings with. (Some Columbia students are sponsored by the UN and confirmation of enrolment and costs is often requested; such requests should be accompanied by the student's permission to provide the information.)

(\* Parents of students under the age of 19 registered in a High School Program at Columbia College are sent a copy of the student's academic record at the end of each semester.)

It is worth noting that the privacy laws in BC do not prohibit colleges from responsibly disclosing a student's personal information, including information about their mental, emotional or other health conditions, to parents or others who may be able to help in a crisis, and that BC's Personal Information Protection Act (PIPA) allows for the disclosure of personal information if compelling circumstances exist that affect anyone's health or safety.

(Document from the Office of the Information and Privacy Commissioner entitled Emergency Disclosure of Personal Information by Universities, Colleges and Other Educational institutions, October 2008.)

### **Information Retained**

In addition to the student's academic record at Columbia College (a record that includes all courses taken in any program), regular student files contain copies of the student's academic record before coming to Columbia College (used for admission purposes), course planning forms, details provided in his/her application, and letters sent to the student advising him/her of probationary status, etc. The file also contains copies of letters written by the College advising CIC of the student's status (when he/she is applying to extend a Study permit, for example). Medical notes and so on are also kept in the student file.

There are specific requirements for students in some High School Programs (Senior Secondary and Adult Secondary). For such students the College must maintain PSR (Personal Student Record) forms (1704) – required items are held in a plastic folder and kept in a fireproof cabinet in the Records Room. These paper files are kept indefinitely.

## **STUDENT RECORDS – DETAILED REQUIREMENTS FOR SECONDARY STUDENTS**

### PART I. PERMANENT STUDENT RECORD

#### **Required items**

1. Permanent Student Record Form 1704, PSB 048 (revised 1997)
2. (Minimum) two most recent years Student Progress Reports or an official transcript of grades. Columbia keeps copies of transcripts in student files, and copies of previous student records which were used for admission purposes.
3. Student Learning Plan (SLP). (A 1-2 page overview will fulfill this requirement, rather than the entire SLP folder. SLP overview provides students' personal and career plans, and short- and long-term goals regarding academic planning, career planning and work experience.) Columbia retains course planning forms for this purpose.
4. Copies of inclusions. (Noted on 1704 form. Might include:

#### Required

- a. Health services information as indicated by a medical alert.
- b. Court orders (as indicated by the legal alert).
- c. Other legal documents (e.g. name change or immigration document).
- d. Support services information (e.g. speech and hearing tests)
- e. Individual Education Plans or Case Management Plans.

Optional

- f. Standardized test scores.
- g. Records of information deemed relevant to student's educational program.
- h. Awards information.

Information is updated on a regular basis by the Secondary Counsellor. Since Secondary students are required to see a counsellor at least once per semester (4 months), files are updated three times per year.

PSRs are kept in a fire-proof cabinet in the Records Room. Records are maintained until requested by another school or for 55 years after a student has withdrawn or graduated.

PART II. ADDITIONAL ITEMS

**Required items**

This list is designed to meet independent school funding requirements (not relevant to CC) and student safety standards.

1. Legal name of child.
2. Allergies, medication and other health concerns.
3. Emergency contact numbers.
4. Doctor's name and contact information (where possible).
5. Care card number or other medical insurance information.
6. Official name(s) of parents and/or guardians and contact numbers.

**Optional items**

7. Standardized test scores. CC keeps record of LWA and MPT as well as results of TOEFL, etc.
8. Records of information deemed relevant to the student's educational program.
9. Award information.
10. Previous student progress reports.
11. Student disciplinary reports.
12. Reports of important meetings.

**Sensitive items – should be regarded as highly confidential**

1. Psychiatric reports.
2. Family assessments.
3. Referrals to counseling services.
4. Report(s) of alleged sexual or physical abuse.

Student records are available to parents/guardians of a student who is a minor (unless restricted by a court order) while accompanied by the Head of High School, or designate, to interpret the records. A copy of the student record will be made available to that parent/guardian upon request.

Access to student records will be granted to:

- The court when ordered to do so;
- The School's insurer, with parental consent, for the purpose of defending a claim or potential claim;
- Professionals, without parental consent, who are planning for or delivering education, health, social or other support services to that student.

Prior to access, the professional or insurer must provide the School in writing that they will:

1. Maintain privacy of the student and the student's family with respect to matters disclosed in the record;
2. Not use or disclose information in the student record except for the specific purposes for which the information is provided.

If requested by a school, school board or school authority in BC, the PSR will be transferred after Columbia College has made a photocopy of the record. If an independent school requests the transfer a copy (of PSR, Student Learning Plan and IEP) will be sent and the original retained. This policy will also apply to requests received from schools outside BC. A record is made of all such transfers.

#### **BACK-UP OF INFORMATION**

Columbia College's Student Records System is backed-up daily, with copies being kept at both the Main Campus (438 Terminal) and the North campus (333 Terminal). The long-term plan is to investigate backup further afield, possibly in Toronto.

#### **LINKS TO SUPPORTING FORMS, DOCUMENTS, WEBSITE:**

*Student Records Requirements & Best Practice Guidelines 2012 (updated July 2021)*; Ministry of Education and Child Care – Independent Schools Office

#### **REFERENCE TO EMPLOYMENT AGREEMENT CLAUSES:**

n/a

#### **REFERENCE TO BYLAWS:**

n/a

#### **RELATED ACTS AND REGULATIONS:**

n/a

#### **RELATED POLICIES:**

n/a

**C. APPROVALS:**

**APPROVAL FOR ALL POLICIES:**

<b>Responsible Owner:</b>	<small>Signed by:</small> <i>Rose Black</i> <small>8F8545518F8D3466...</small>	<b>Date:</b> 1/13/2025
<b>Principal or Designate:</b>	<small>Signed by:</small> <i>Matt Wadsworth</i> <small>4E77F4A06098DC...</small>	<b>Date:</b> 1/13/2025
<b>Chair, Board of Governors:</b>	<small>Signed by:</small> <i>David M. Clarke</i> <small>419772B1F2C4E5...</small>	<b>Date:</b> 1/14/2025

<b>Proposed Review Date:</b> December 2027	<b>Dates(s) revised:</b> 12/2/2024	<b>Replaces Policy/Form Number:</b> N/A
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