

Official Student Record Information Privacy Policy

Policy Category:	General Policy
Subject:	Official Student Record Information Privacy Policy
Subsections:	Purpose; Definitions and General Principles; Information Contained in Official Student Records; Access to and Disclosure of Information; Custody, Storage and Retention of Official Student Record Information
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Responsible Committee :	Senate Committee on Academic Policy
Related Procedures:	*
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1. PURPOSE

This document sets out the University's policy on the collection, use and disclosure of the personal information that forms part of the Official Student Record and the personal information collected on prospective applicants and applicants who do not become students. It applies to the Office of the Registrar, the Faculty of Graduate Studies, and all other academic and administrative units that are the primary and secondary custodians of specified data collected and stored about prospective applicants, appli

2. DEFINITIONS AND GENERAL PRINCIPLES

For the purposes of this policy:

- a) *prospective applicant* means a person who has indicated an interest in applying for admission to the University and/or who has been identified by the University as a person who will be considered for recruitment (e.g. major scholarship winners);
- b) *applicant* means any person who has formally applied for admission to the University and whose application is still active;
- c) *current student* means any person who is active in the current term and/or active in any program at the University. *[A student is considered to be active in the current term if he or she has taken some action, such as completing registration, paying a tuition deposit or a portion of term tuition fees, or completing an add/drop. A student is considered active in a program within a period of 2 years of being active in a term];*
- d) *alumnus or alumna* means any person who has received a degree, diploma or certificate from the University and is not active in a program. *[For the purposes of this policy a Western graduate who is also a current student is considered a current student];* and
- e) *former student* means any person who has attended the University but has not received a degree, diploma or certificate and is not active in a program.

During the University recruitment process, information will be collected and used to identify prospective applicants who will be encouraged to apply for admission to the University.

During the admission process, information will be collected and used to establish a record and assess an applicant's qualification for admission to the University.

During the registration process and the student's subsequent academic career, specific information that constitutes the Official Student Record will be collected, maintained and used by the University to:

- record performance in programs and courses;
- record decisions of academic appeals/petitions and scholastic and non-academic offence decisions and sanctions;
- provide the basis for financial aid, awards and government funding; and,

3. INFORMATION CONTAINED IN OFFICIAL STUDENT RECORDS

Official Student Records, in electronic or paper form, contain the following information relating to a student's application, admission, and performance at the University:

- a) personal information (name, address, e-mail address, telephone, date of birth, citizenship, social insurance number, student number, photograph, etc.);
- b) basis of admission information (application, record of previous studies, letters of recommendation, test results, etc.);
- c) registration and enrollment information (programs of study, dates of attendance, academic load, courses taken, credits transferred, etc.);
- d) performance information (grades, averages and ranks, narrative evaluations, clinical evaluations, distinctions/awards, special permissions, academic counselling information, degrees obtained, requirements to withdraw, scholastic offence decisions¹, etc.);
- e) decisions relating to academic appeals/petitions;
- f) decisions against a student, including appeal decisions, under the Code of Student Conduct;
- g) medical information given to a Faculty related to a student's performance that is provided by or collected with the consent of the student; and
- h) financial information (tuition fees and other charges, payments, awards, debts, etc.).

The following information is not considered to form part of the Official Student Record and is not covered by the provisions of this policy:

- medical information provided to Student Health Services;
- information relating to the employment by the University of current students, alumni/ae or former students; and
- information other than basic demographic data that is maintained by or on behalf of Alumni Affairs and Development and which is deemed to constitute the Official Alumni Record.

with the prior consent of the student. This provision applies regardless of the age of the student (i.e., whether or not they are under the age of 18) as it is the student's ability to consent, rather than their age, that is the determining factor in their right to exercise control over their own personal information.

(e) Faculty and Staff

Within the University, access to the Official Student Record is restricted to faculty and staff who have a legitimate need for the information in order to carry out the responsibilities of their position or office as it relates to the administration of student affairs and services. For example, access to information contained in the Official Student Record of current students, former students or alumni/ae who are also employees of the University will not be provided for employment related purposes without the prior consent of the individual. Similarly, details of medical information supplied to Faculty offices will not be released without the prior consent of the individual.

Access to financial assistance information of the Ontario Student Assistance Program, to other forms of assistance based on financial need, or to individual earnings is restricted to financial aid staff in the Office of the Registrar, and to a limited number of authorized staff in the Faculty of Graduate Studies, Housing and Ancillary Services, Deans' and other administrative offices. Relevant information is routinely provided to government agencies with a legitimate need to know, such as those involved in the administration of scholarship or financial aid programs.

The Department of Advancement Services and the Department of Alumni Relations and Development will be permitted access to personal information relating to the identity and location of prospective applicants, applicants and students in order to maintain contact with the individuals and inform them of events, programs and services.

Ensuring the security and privacy of personal information is a collective responsibility of the Office of the Registrar and Faculty of Graduate Studies, and the Deans, Chairs, Directors and managers of academic and administrative units. All full-time and part-time faculty and staff who receive this information must be formally notified of the contents of the Policy, the requirement to adhere to its provisions, and the implications of non-compliance.

E-mail often provides the most efficient and timely medium for communicating with students, prospective applicants, applicants, former students and alumni/ae. However, personal information should not normally be communicated electronically. Where such communication is necessary, a reasonable effort will be made to correctly identify the requester and/or recipient prior to sending personal information.

(f) Alumni/ae and Former Students

An alumnus, alumna or a former student may request access to his or her Official Student Record in accordance with the Access Procedure set out in Section 6 of the

between the University and the agent that specifies the purpose(s) of the disclosure and the University's expectations with respect to confidentiality.

5. CUSTODY, STORAGE AND RETENTION OF OFFICIAL STUDENT RECORDS

The University maintains Official Student Records in electronic or paper form. Electronic records contain information required to monitor the progress and performance of students, produce periodic performance reports, and provide attestations of achievement and official transcripts of academic records. They also form the basis of management information needed for the operation of the University and for enrollment reports and statistical information required by government agencies. All portions of the electronic student academic record needed to produce official transcripts are maintained indefinitely. As these records are retained on a permanent basis they will be reviewed periodically, especially at times of an upgrade of the electronic records system or migration to a new system. Metadata pertaining to the system itself will be maintained in hard copy form in the University Archives. Other information in electronic and paper form is retained or disposed of according to the Disposition and Retention Schedules prepared in consultation with the University Archives.