

 CAPILANO UNIVERSITY		POLICY	
Policy No.	Officer Responsible		
OP.606	Vice-President, Strategic Planning, Assessment and Institutional Effectiveness		
Policy Name			
Student Records Management and Access			
Approved by	Replaces	Category	Next Review
SLC		IM&DT	January 2029
Date Issued	Date Revised	Related Policies	
January 4, 1990	January 24, 2024	B.506 Standards of Conduct B.700 Privacy and Access to Information Policy	

1. PURPOSE

- 1.1 The purpose of this policy is to outline the roles, responsibilities, and authorities for managing and accessing student records. The policy supports B.700 Privacy and Access to Information Policy with respect to student record management.
- 1.2 Capilano University ("the University") gathers and maintains information used for the purposes deemed appropriate by the University, for the operation of the University, and consistent with the mandate of the University pursuant to the *University Act*, RSBC 1996, c. 468. In signing an application for admission, graduation, or a registration form, all applicants are advised that both the information they provide, and any other information placed into the student record will be protected and used in compliance with the *Freedom of Information and Protection of Privacy Act*, RSBC 1996, c. 165 (FIPPA).
- 1.3 The Registrar is responsible for authorizing and providing access to student records. Access is granted on a "need to know" and "need to access" basis. No information regarding any student will be divulged to any agency or person other than the student without the student's written permission, unless otherwise noted below.

2. DEFINITIONS

For the purpose of this Policy, the following definitions apply:

"Employee" means any person employed by the University.

"Personal Information" means recorded information about an identifiable individual other than business contact information.

“Records” includes books, documents, maps, drawings, photographs, letters, vouchers, papers and any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means, but does not include a computer program or any other mechanism that produces records. Records created or received by university officers or employees in the course of their duties on behalf of the university belong to Capilano University and are subject to FIPPA.

“Student” means an individual enrolled in any course (credit or non-credit) at the university.

“Student records” means recorded information that is personally identifiable or traceable to the student and includes the records of current, alumni and prospective students (individuals who have provided their information to the University but have not completed an application for admission).

Student records include, but are not limited to:

- a) Academic records (e.g. transcripts);
- b) Registration status;
- c) Awards and distinctions; and
- d) Student’s faculty and declared program of study.

“Third party” means a person, group of persons, or an organization other than the individual the information is about. An employee of the University, acting in their official capacity, is not considered a third party.

3. SCOPE

This policy applies to the management of and access to all student records by employees, students and third parties.

4. POLICY STATEMENT

- 4.1 The University will enable self-service options, where possible, for students to make corrections to their personal information. Where this is not possible or where assistance is required, the Registrar should be contacted in accordance with B.700.2 Right to Request Correction Procedure.
- 4.2 Students may be provided with a copy of their own student record upon written request to the Registrar’s Office. Student record information will be released only upon presentation of photo identification (i.e. valid driver’s licence, passport, or Capilano University student identification card).
- 4.3 A student record may be redacted if it contains information covered by exceptions to disclosure found in FIPPA, including, but not limited to, disclosures that would:
 - a) be an unreasonable invasion of a third party’s privacy;
 - b) result in harm to Capilano University’s financial interests;
 - c) reveal advice or recommendations; or
 - d) result in harm to someone’s safety or the security of a facility or system.

- 4.4 Security and maintenance of student record information is the responsibility of the Registrar's Office and student information is not to be released to any third party except with the student's written consent or on the authorization of the Registrar and/or the Vice- President Academic & Provost, pursuant to section 4.6 of this policy.
- 4.5 A student may authorize release of their own student record information to any third party by providing signed and dated consent indicating what records are to be released, to whom, the purpose of the disclosure, and the date on which the consent is effective and, if applicable, the date on which the consent expires.
- 4.6 University employees who have a legitimate need to view student records in the course of their official university duties will be permitted restricted access to records based on their need and upon submission of a signed Confidentiality and Release of Information Agreement to Human Resources. The level and nature of access should be related to their particular administrative duties. These duties include but are not limited to:
- a) the efficient, safe and effective management of the university, including campus security;
 - b) the provision of responses to prospective students who have approached the university for information;
 - c) the management of student applications;
 - d) the management of registered students during their enrolment period, including academic, financial, library and information systems management;
 - e) the management of graduation and subsequent transcript processing;
 - f) the management of alumni relations;
 - g) the management of fundraising activities with university students and graduates; or
 - h) the marketing of university programs.
- 4.7 The Registrar and/or the Vice-President, Strategic Planning, Assessment and Institutional Effectiveness are authorized to disclose student record information without written student consent:
- a) to government departments or their agents where Capilano University is required by law to provide the requested information;
 - b) to respond to a valid court order, search warrant, subpoena, summons, or other legal document served upon the university;
 - c) to respond to appropriate parties if knowledge of the information is necessary to protect the health or safety of the student or other individuals; or
 - d) as permitted by B.700 Privacy and Access to Information Policy under sections 33.1, 33.2, 33.3, or 35 of FIPPA.

5. DESIGNATED OFFICER

The Vice President of Strategic Planning, Assessment, and Institutional Effectiveness is the Policy Owner, responsible for the oversight of this policy. The Administration of this Policy and the development, subsequent revisions to and operationalization of any associated procedures is the responsibility of the Registrar.

6. RELATED POLICIES AND GUIDANCE

B.700 Privacy and Access to Information Policy

B.700.1 Personal Information Incident Management Procedure

B.700.2 Right to Request Correction Procedure

Privacy Guidelines for Employees

Privacy Impact Assessment Guide

Confidentiality and Release of Information Agreement

7. REFERENCES

Freedom of Information and Protection of Privacy Act

Freedom of Information and Protection of Privacy Regulations

Government of British Columbia Guide to Good Privacy Practices

Office of the Information and Privacy Commissioner for British Columbia