

SECTION:	Students		
TOPIC:	Student Records		
EFFECTIVE DATE:	April 16, 1987	REPLACES:	500-05 – Confidentiality and Security of Student Records
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Original signed by President + CEO			

PREAMBLE

- Information that forms part of the student record is collected under the authority of the Post-Secondary Learning Act of the Province of Alberta, the Alberta [Freedom of Information and Protection of Privacy Act](#), the Statistics Act (Canada) and the Taxation Act (Canada). Information is protected under provisions of the [Freedom of Information and Protection of Privacy Act](#) and is used to determine eligibility for admission and financial assistance, to advise students about academic programs, and to assist the college in the administration of its affairs.
- ACAD is committed to taking every reasonable step to protect the confidentiality and privacy of the information contained in students' records. Information contained in a student record is disclosed to relevant academic and administrative departments for the purposes of, administration of ACAD policies and procedures, programs and services, registration, providing tax receipts, determining eligibility for scholarships, awards and graduation, distributing follow-up educational information, college research, and college alumni programming. In addition, specific elements of information will be disclosed to the federal and provincial governments to meet reporting requirements and to the ACAD Students' Association and other cooperating educational, funding and workplace agencies in accordance with contractual agreements. If granted an award, pertinent information will be released to the donor of the award and to provincial funding bodies. Awards and credentials awarded to a student are part of the public record and may be disclosed to third parties upon request.
- By applying for admission to ACAD, students accept and acknowledge the college's right to collect and disclose pertinent personal information. Students also agree that all documentation which they submit to ACAD in support of an application for admission, financial award or any appeal or petition becomes the property of the college.
- The creation, management and retention of student records are vested in the Registrar. Therefore, in accordance with this procedure, the Registrar has the responsibility and authority to grant or deny access to student records. All matters pertaining to the interpretation of this procedure should be referred to the Registrar.
- This procedure applies to all versions of the student record, whether in computerized databases, microfilm or hard-copy files, and to all offices where that record may be stored, whether collected by that office or duplicated from the Registrar's official record. The entitlement to access certain records

does not include the authority to release information from the record except as provided in this procedure.

Student information which is collected and maintained by other offices and for purposes other than those specified below in section 'A', (i.e., is not part of the student record) does not come under this procedure but is under the jurisdiction of the Head or manager of that office.

- A record of a student's academic history (transcript) at ACAD is preserved permanently, but all other documentation contained in the student's file will be destroyed when no longer required. Records of students who attended the Alberta College of Art (now ACAD) as a college of the Southern Alberta Institute of Technology (SAIT) prior to 1985 are stored and retained at SAIT.

A. DEFINITION OF STUDENT RECORDS

A student's record consists of the following:

- personal information (e.g. name, address, telephone, date of birth, nationality, next of kin)
- basis of admission (e.g. application, record of previous studies, test results)
- enrolment information (programs of study, dates of attendance, registration activity)
- academic performance information (warning letters, midterm and/or final grades, academic standing, degrees obtained)
- results of petitions and appeals filed by the student
- medical information relevant to a student's academic performance, and provided by or at the request of the student, or with the consent of the student
- financial and awards information
- student conduct information (e.g. complaint reports resolution agreements, sanctions, appeals)

The student record may be in the form of hard copy or electronic files. Each student's hard copy file will normally contain:

- all letters and forms which bear the signature of the student; official supporting documents provided by, or at the request of, the student (e.g., record of previous studies, test scores, medical certificates)
- documents pertaining to the student's program, or the evaluation of the student's work at ACAD
- other factual documentation considered pertinent to the student's program

The electronic file will contain all the information required to monitor the progress and performance of the student, produce periodic performance reports, and provide records of achievement and official transcripts. Electronic files also form the basis of information needed for the administration and operation of the college and for enrolment reports and statistical information required by government agencies.

B. RETENTION OF STUDENT RECORDS

Hard copy files will normally be destroyed seven (7) years after graduation or the last registration activity at ACAD with the exception of documents pertaining to disciplinary actions which will be kept permanently.

All portions of a student's electronic record which are needed to produce official transcripts will be permanently maintained.

Documentation submitted by applicants who are not accepted, or by applicants who fail to enrol following acceptance, will normally be destroyed one year after the application term with the exception of documents pertaining to disciplinary actions which will be kept permanently.

See Appendix A-Student Records Retention Schedule for specifics pertaining to student records retention.

C. ACCESS TO STUDENT RECORDS AND DISCLOSURE OF INFORMATION

Personal information is defined in the [Freedom of Information and Protection of Privacy Act](#) as recorded information about an identifiable individual. It includes such information as an individual's name; home or business address; home or business telephone number; race, national or ethnic origin; age; sex; marital or family status; identifying number; health and health care history; educational, financial, employment or criminal history; anyone else's opinions about the individual; and the individual's personal views or opinions, unless they refer to another party.

Alberta College of Art + Design staff shall ensure that the personal information of its students is not inappropriately disclosed. Staff working with student records shall be required to sign a confidentiality agreement (Appendix B) and shall follow the approved Guidelines for Disclosure of Information Contained in Student Records outlined in Appendix C.-

1. Public Access

The following information is considered public information and may therefore be released to a third party without the student's consent:

- name
- dates of registration
- degree(s)/diploma(s) awarded from the college, including dates of convocation and "with Distinction" notations attached to the degrees/diplomas
- attendance at or participation in a public event or activity related to the institution (e.g., graduation, awards ceremony or cultural event)
- personal information that exists in other public forums.

Except as specified as follows, all other information will be disclosed only with the student's written consent.

2. Student Access

Students have the right to inspect all information contained in their student record.

Students shall only be allowed to review the file under supervision. The right of access does not give a student the right to remove, change or destroy information contained in the file. The file constitutes the college's record of decisions and transactions relating to the student, and therefore, should not be altered unless both parties agree.

Students have the right to request that erroneous information contained in their record be corrected and that recipients of any information found to be in error be advised of the correction.

Upon written request, students who have no outstanding financial obligations to the college may obtain an official transcript of their record of studies or have copies thereof sent to a third party. All official transcripts will be complete and unabridged.

3. Staff Access

Faculty, staff and employees of the college may be given access to information contained in student records provided the information requested:

- is necessary for them to perform their official duties, such as collecting debts owed the college or verifying a student's suitability or eligibility for a program or benefit.

4. Students' Association Access

Personal student information may be released to ACADSA in accordance with contractual agreements.

5. Legally Mandated Access

Specified records, or portions thereof, may be provided to persons or agencies pursuant to:

- a court order, summons or subpoena directing the college to release information
- an enactment of Alberta or Canada that authorizes or requires the disclosure (e.g., reports to Statistics Canada)
- requirements of duly constituted professional licensing and certification bodies

6. Emergency Access

In an emergency situation involving the health and safety of an individual, or in compassionate situations such a death or injury of a spouse, relative or friend of a student, the President, Registrar, or a VP/Director of the college may authorize the release of information needed to contact the student or the student's next of kin, if they consider it to be in the student's best interest.

STUDENT RECORDS RETENTION SCHEDULE

Admissions Records - Non-registered applicants (accepted or rejected)

Document/Data	Form	Retention
Acceptance letters	Electronic	1 year after application term
Acceptance decision	Electronic	Permanent
Admission applications	Electronic	Permanent
Admission applications	Electronic Hard copy	Permanent 1 year after application term
Transfer Credit Evaluation	Electronic Hard copy	Permanent 7 years after graduation or date of last attendance
Correspondence, pertaining to application	Hard copy	1 year after application term
Permanent residency documentation	Hard copy	1 year after application term
Test scores (eg. TOEFL, Artstream assessments)	Electronic Hard copy	Permanent 1 year after application term
Transcripts	Electronic Hard copy	1 year after application term 1 year after application term
Disciplinary Action	Electronic Hard copy	Permanent Permanent

Admissions Records - Registered Students

Document/Data	Form	Retention
Acceptance letters	Electronic	1 year after application term
Acceptance decision	Electronic	Permanent
Admission applications	Electronic Hard copy (if applicable)	Permanent 7 years after graduation or date of last attendance
Transfer Credit Evaluation	Electronic Hard copy	Permanent 7 years after graduation or date of last attendance

Correspondence, pertaining to admission	Hard copy	7 years after graduation or date of last attendance
Permanent residency documentation	Hard copy	7 years after graduation or date of last attendance
Test scores (e.g. TOEFL, Artstream assessments)	Electronic Hard copy	Permanent 7 years after graduation or date of last attendance
Transcripts	Hard copy	7 years after graduation or date of last attendance
Transcripts	Electronic (EDI or hand-keyed)	Permanent

Registration and Academic/Student Conduct Records

Document/Data	Form	Retention Period
Academic Records	Electronic	Permanent
Address Changes	Electronic	Permanent
Final Grade Rosters	Electronic Hard copy	Permanent 1 year
Midterm Grade Rosters	Electronic Hard copy	Permanent 1 year
Change of Grade	Electronic Paper (grade file) Paper (student file)	Permanent 1 year 7 years after graduation or date of last attendance
Mobility/Practicum Evaluations	Hard copy	7 years after graduation or date of last attendance
Application for Graduation	Electronic Paper	Permanent 1 year after date of graduation
Class Lists	Electronic	Permanent
Correspondence, pertaining to the academic record or registration	Electronic Hard copy	1 year following receipt 7 years after graduation or date of last attendance

Course Registrations and Changes	Electronic Hard copy (where applicable)	Permanent 7 years after graduation or date of last attendance
Degree Audit Records	Electronic	Permanent
Disciplinary Action	Hard copy Transcript notation	Permanent (retained after student file is purged) Retained as specified in disciplinary judgment
Failure "F" Reports (discontinued January 2007)	Hard copy	7 years after graduation or date of last attendance
Fees Letters and Appeals	Hard copy	7 years after graduation or date of last attendance
Fee Assessments	Electronic	Permanent
Grade Appeals, Application	Hard copy	7 years after graduation or date of last attendance
Graduation Lists	Electronic	Permanent
Graduation/Program Authorizations	Hard copy	7 years after graduation or date of last attendance
Hold Lists	Electronic Hard copy	Until hold is removed 1 semester
Incomplete "I" Reports	Hard copy	7 years after graduation or date of last attendance
Letters of Permission	Hard copy	7 years after graduation or date of last attendance
Name Changes	Electronic Hard copy	Permanent 7 years after graduation or date of last attendance
Prerequisite Waivers	Electronic Hard copy	Permanent 7 years after graduation or date of last attendance
Transcript Request Forms	Hard copy	1 year
Tuition Deferment Agreements	Hard copy Electronic	7 years after graduation or date of last attendance Permanent
Warning Letters	Hard copy	7 years after graduation or date of last attendance



Financial Aid + Awards Records

Document/Data	Form	Retention
Awards Applications	Hard copy	1 year
Awards Letters	Hard copy (if applicable) Electronic	1 year Permanent
T4A Tax Receipts	Hard copy Electronic	7 years Permanent
Student Loan Documents	Hard copy	1 year
Financial Aid and Awards Correspondence, general	Electronic Hard copy	1 year following date issued 1 year following date issued



STUDENT RECORDS CONFIDENTIALITY AGREEMENT

Employee Name (please print)

By signing this form, I attest to the following:

1. I understand that the Student Services and the Registrar's Office are responsible for safeguarding and maintaining the integrity of student academic records at Alberta College of Art + Design ("college");
2. I understand that all information concerning prospective, current and former students is strictly confidential and may only be released in strictest in accordance with college policy and provincial and federal legislation, as amended from time to time;
3. I undertake not to reveal any information about prospective, current or former students or groups thereof to anyone, except as required in the course of my duties and in accordance with the college's Student Records policy and procedure, during my employment; and further not to remove or disclose any information whatsoever after the completion of my employment with the college;
4. I will not tamper with, destroy, falsify or otherwise improperly deal with any college records or files of any kind whatsoever;
5. I will not create any false record in the college's official records;
6. I acknowledge, that, if I should contravene any of the terms of this declaration, it shall constitute cause for discipline and the college reserves the right to seek prosecution of individuals committing such infractions;
7. I have carefully read and accept this declaration.

Signature of Employee

Date

Signature of Witness

Date

APPENDIX C - GUIDELINES FOR DISCLOSURE OF INFORMATION CONTAINED IN STUDENT RECORDS

ACAD's use and collection of information contained in student records is acknowledged by students on their application for admission.

Guidelines for Disclosure of Student Records:

1. Disclosure of Student Information to Third Parties
2. Disclosure of Personal Information to the Student
3. Correction of Personal Information
4. Distribution of Graded Examinations, Narrative Assessments and Assignments
5. Retention of Student Examinations and Assignments
6. Posting Student Grades
7. Letters of Reference

1. Disclosure of Student Information to Third Parties

It is incumbent on all Alberta College of Art + Design staff to ensure that the personal information of students is not inappropriately disclosed. Personal information is defined in the [Freedom of Information and Protection of Privacy Act](#) as recorded information about an identifiable student. It includes such information as an student's name; home or business address; home or business telephone number; race, national or ethnic origin; age; sex; marital or family status; identifying number; health and health care history; educational, financial, employment or criminal history; anyone else's opinions about the student; and the student's personal views or opinions, except if they are about someone else.

The following guidelines will help staff to make appropriate disclosure decisions. You may disclose a student's personal information to a third party if the disclosure is not an unreasonable invasion of the student's personal privacy. It does not constitute an unreasonable invasion of privacy to release the following information:

- Name
- dates of registration
- degree(s)/diploma(s) awarded from Alberta College of Art + Design including "with distinction" notations attached to the degrees/diplomas
- graduation dates
- attendance at or participation in a public event or activity related to the institution (e.g., graduation, awards ceremony or cultural event)
- personal information that exists in other public forums.

When individuals apply to be admitted to Alberta College of Art + Design, they acknowledge that, although the above information is personal information and subject to consideration under the [Freedom of Information and Protection of Privacy Act](#), it has been determined to be a matter of public record on this campus and will be disclosed to third parties.

You must refuse to disclose a student's personal information to a third party if the disclosure would be an unreasonable invasion of the student's privacy. It would be an unreasonable invasion of privacy to release the following kinds of information to a third party unless the disclosure is authorized:

- home address or telephone number
- information relating to an individual's race, national or ethnic origin; age; birth date; marital or family status; health or health care history

- educational history (with the exception of information specified above)
- ID number
- evaluative information
- timetable information
- fees information

You may disclose a student's personal information to a third party if the student has identified the information and consented in writing to the disclosure. Consent must be obtained prior to disclosure in the following kinds of cases:

- official transcript requests
- potential employer requests an evaluation of a former or current student
- student requests that you write a reference letter in support of an application for admission to a graduate school

You may also disclose a student's personal information to a specific third party if the disclosure is authorized under the Act ([Freedom of Information and Protection of Privacy Act](#)). Section 40(1) includes the following authorities:

- for the purpose for which the information was collected or compiled or for a use consistent with that purpose
- for the purpose of complying with a collective agreement
- for any purpose in accordance with an enactment of Alberta or Canada that authorizes or requires the disclosure (e.g. reports to Statistics Canada)
- to an officer or employee of Alberta College of Art + Design if the information is necessary for the performance of his or her duties
- for the purpose of collecting a fine or debt owed by an individual to Alberta College of Art + Design
- for the purpose of determining or verifying an individual's suitability or eligibility for a program, award or benefit
- for the purpose of the administration of college policies and procedures
- to any prescribed body for audit purposes
- to contact the spouse, relative or friend of an injured, ill or deceased student

NOTE In all cases, the college should disclose personal information only to the extent necessary to enable the officer or employee to carry out the purpose described.

Section 40 enables disclosure; it does not require disclosure. Staff should not assume that the person requesting the personal information of a third party is authorized to receive the information. Although staff has a duty to assist any person who requests information, when the personal information of a third party is involved, the onus is on the applicant to provide evidence of authorization. At the same time, the onus is on the staff member of the college to ensure that information is not inappropriately disclosed.

Staff should:

- ensure that personal information is provided only to an individual who is entitled to the information. If you receive a request by phone and cannot confirm the identity of the caller, ask for some information that will allow you to identify the caller or verify the phone number and return the call yourself or respond by e-mail.
- ask a relative to provide identification and evidence that he or she has authority to act on a student's behalf
- request that the bank provide evidence of consent to release specific financial information
- request that a student provide written consent before you write a letter of reference or respond to a request for an oral evaluation.

If the information cannot be disclosed or if the information is included with information that cannot be disclosed, the applicant may need to file a formal request for access to the information.

2. Disclosure of Student Information to the Student

The [Freedom of Information and Protection of Privacy Act](#) provides students with a right of access to personal information about themselves held by Alberta College of Art + Design.

This right, however, is limited by specific exceptions. The following guidelines will help staff who have custody of student files to make appropriate decisions about the disclosure of personal information to the subject.

You may routinely disclose information in the following categories:

- that portion of the student file that is deemed to be accessible to the subject
- information supplied by the subject
- information copied to the subject
- transcripts
- graded assignments, exams, assessments

NOTE: The student should only be allowed to review the file under supervision. The right of access does not give a student the right to remove or destroy information contained in the file. The file constitutes the department's record of decisions, transactions relating to the student, and therefore, should not be altered unless both parties agree.

The following categories of information should not be routinely disclosed:

- letters of reference supplied in confidence
- evaluative comments provided by anyone in a formal evaluation process
- documents relating to a grievance or appeal process
- documents relating to legal or administrative investigations
- letters of complaint, unless the author has consented to the disclosure
- other documents supplied to the college with the understanding that they be kept confidential

If an applicant requests information that cannot be routinely disclosed or is included with information that cannot be routinely disclosed, the applicant may need to file a formal request for access.

3. Correction of Personal Information

Under the terms of the [Freedom of Information and Protection of Privacy Act](#), Alberta College of Art + Design is responsible for ensuring that personal information collected and maintained by the institution is accurate and complete. The Act also provides students with the right to examine information held about them by the college and to request corrections of that information.

A student does not need to file a formal request for correction of personal information for a routine change. Names, addresses, grades and other similar pieces of personal information are corrected or updated on a regular basis and this should continue to be done informally.

A student who believes there is an error or omission in personal information held by the college may file a request for correction as per section 36 of the Act. A student may choose to file a formal request for a correction if, for example, the college has confused the records of two people with the same name. Information may be entangled, inaccurate linkages may have been made, and it may be a complex problem to sort out.

The college must review all formal requests for correction if:

- the information is in the custody or under the control of the institution
- the information is a matter of fact, the college must not correct an opinion, including a professional or expert position.

This provision of the Act cannot be used by a student to compel destruction of records that document an activity, transaction, decision or relationship relating to the student.

A formal request for correction of personal information must be in writing and must be directed to the Registrar.

If a correction is made under section 36 of the Act, the college must notify any other public body or any third party to whom the incorrect information had been disclosed during the year prior to the date the correction was requested that a correction has been made.

4. Distribution of Graded Examinations, Narrative Assessments and Assignments

Section 38 of the [Freedom of Information and Protection of Privacy Act](#) states that the head of a public body must protect personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or destruction.

In view of the provisions of the Act, the practice of placing graded examinations and assignments in a public place for pick up is considered an unreasonable invasion of privacy and not acceptable.

Examinations and assignments should be returned directly to the student. Students should not be allowed to handle exams or assignments other than their own.

Acceptable procedures include the following:

- return exams and assignments during class time
- place exams and assignments in sealed envelopes and allow students to retrieve them from the department office.

Exceptions are permitted only if the faculty member:

- acquires prior written consent from the student to openly distribute their graded examinations and assignments. If faculty decides to go this route, they should consider configuring the exam or assignment so that comments and grades are either on or attached to the last page.

5. Retention of Student Examinations and Assignments

Section 35 of the [Freedom of Information and Protection of Privacy Act](#) states that any personal information used by the public body to make a decision that directly affects the individual must be retained for at least one year. The intention is to ensure that the individual has a reasonable opportunity to obtain access to it.

Graded examinations and/or assignments which are not returned to the student are considered to be personal information that is used by the college to make a decision that directly affects the individual. In accordance with section 35 of the Act, these records must be retained for a period of one year from the date of decision.

6. Posting Student Grades

Section 38 of the [Freedom of Information and Protection of Privacy Act](#) states, that the head of a public body must protect personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or destruction.

In view of the provisions of the Act, the practice of posting student grades in identifiable form, either by name or by student identification number sorted in alphabetical order, is considered an unreasonable invasion of privacy and not appropriate.

Acceptable alternative: When posting or circulating grades, the student's name should be stripped from the list and the marks given in a non-identifiable form sorted in a random numeric sequence by student number. The Registrar's Office can provide this sorting option.

7. Letters of Reference

Faculty and staff who provide verbal or written references should ensure that the student fills out an appropriate consent form and provides the requested referee with a copy. If this is not possible, the student or employee should provide the faculty or staff member with some evidence of consent. The request or even a copy of the application or CV in which a faculty or staff is named as a referee can be forwarded by mail, e-mail or fax and will serve as consent if necessary.

The referee or department must keep a copy of the consent and any information provided for one year, these documents are accessible subject to certain limitations.