

# Student and Applicant Record Policy

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## 1. Purpose

The purpose of this policy is to define the rights and obligations of students and of the University and its officers in matters pertaining to student records and applications. This policy is presented in accordance with ***The Freedom of Information and Protection of Privacy Act*** (herein after referred to as the "Act") and should be read and interpreted within the context of the "Act". The Student and Applicant Record Policy should guide the policies and practices of the Office of the University Registrar (OUR), and of individual Faculties and Schools who are the primary and secondary custodians of data collected and stored about all applicants, students, and former students in degree programs, and certain non-degree programs, for the University. Campus services and affiliated student organizations that from time to time, and for specific purposes, have access to components of student records must also adhere to this policy.

## 2. General Principles

All documentation submitted to the University in support of an application for admission, residence accommodation or financial award, or any appeal or petition, becomes the property of the University. The OUR acts as the official custodian of student information and strives, through systems, processes, and education to ensure the security and privacy of personal information, within the context of any institutional policies guiding the broader networked environment. The responsibility for engendering the protection of privacy must be part of the University's culture and must be fostered by all. This includes: the Deans, Directors, and Department Heads, who ultimately hold responsibility for authorizing access to information for individuals within their Faculties, Schools, and Departments, and those campus services and affiliated student organizations which for specific purposes occasionally have limited access to student records.

The University is committed to taking every reasonable step to protect the confidentiality and privacy of the information contained in the records of applicants, students, and former students. Unless compelled to do so by law, or authorized by the student in writing, the University does not disclose the contents of student records to any party outside the University unless it constitutes public

information as defined later in this policy statement. Within the University, faculty and staff members are given access to information contained in student records on a NEED-TO-KNOW basis only, that is, if they require the information in order to perform their official duties. Student governments may be given limited student data by OUR for the purpose of communicating with students. Access to student records and disclosure of information is more fully described in Section 6 of this policy statement.

A record of students' academic achievements at the University is preserved indefinitely (see Section 5 below). All other personal information contained in students' files may be disposed of when no longer required in accordance with Queen's University's Record Management Policy<sup>1</sup> and in accordance with the University's Student and Applicant Records' Retention and Disposition Schedules.<sup>2</sup>

### **3. Electronic Information and Networked Information**

The increasing reliance upon the electronic collection, processing, and distribution of student and applicant information presents new challenges for the protection of privacy. Distributed network access to retrieve and manipulate data through new information systems, such as the PeopleSoft Student information system, may make traditional security restrictions for information access inappropriate. As a result, this imposes a requirement of due diligence upon Deans, Department Heads, and Directors who are responsible for delegating authority to access student records. This responsibility for due diligence also rests upon all authorized users to ensure the appropriate use and protection of confidentiality of student and applicant information. The OUR administers systems security for the PeopleSoft Student information system and provides training and access to change or update electronic student or applicant records, as directed by the head of the Faculty, School, or Department and approved or authorized by the University Registrar.

The growing use and utility of electronic mail (e-mail) and the Internet for communication present some unique opportunities and challenges. Faculty and staff must use electronic forms of communication with sensitivity and due diligence for the protection of students. In all cases, concern for the protection of the privacy of student and applicant information should take priority over administrative efficiency. To encourage and facilitate electronic communication between instructors and their classes, and between the University and students and applicants, secure e-mail distribution mechanisms (such as Listserv) may be used for broadcast or other group communication. Student names and e-mail addresses may be reviewed by the authorized owner of the class or group Listserv distribution list, with the only exception being those who have requested "additional privacy" (see Section 6.1 below).

When communicating with students and applicants, e-mail often provides the most timely and efficient medium for communication, but sensitive and confidential information should not normally be communicated electronically. The medium is not considered secure for the primary reason that it is not always possible to know the source or destination of the communication to an electronic address. In all

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<sup>1</sup> <https://www.queensu.ca/secretariat/policies/administration-and-operations/records-management-policy>

<sup>2</sup> <http://archives.queensu.ca/records-retention-schedules>

cases, authorized University personnel must make a reasonable effort to correctly identify the requester and/or recipient of the information and should attempt to ensure that the medium of communication is secure and appropriate for the circumstances.

Again, it is noted that to facilitate electronic communication with students by authorized University personnel, the Listserv e-mail distribution mechanism is available (as above Section 3).

#### **4. Information Contained in Student Records**

A student's record may consist of all or some of the following:

- (a) biographic information (name, address, e-mail address, telephone, date of birth, citizenship, next of kin, social insurance number, student number, photograph, etc.);
- (b) basis of admission (application, record of previous studies, letters of recommendation, test results, etc.);
- (c) enrolment information (programs of study, dates of attendance, courses taken);
- (d) performance information (examination results, narrative evaluations, clinical evaluations, distinctions, sanctions, degrees obtained);
- (e) results of petitions and appeals filed by the student;
- (f) medical information relevant to a student's academic performance, and provided at the request, or with the consent of the student; and
- (g) financial information (charges, payments, awards, debts, etc.)

A student's electronic file includes biographic, academic, and financial information. This includes data such as: name, address(es), student number, social insurance number, other biographic information, basis of admission, degree program and concentration, courses enrolled, transferred credits, rulings, grades, averages and ranks, tuition fees, debts, and scholarships and awards.

As a general principle, the University should collect no more information than it needs, namely, all required student and applicant information, and the minimal amount of additional information required to accomplish a legitimate institutional purpose. The University should be explicit about the purpose for which information is gathered at the time of collection and request authorization to release certain personal information externally where applicable. See the University's [Notice of Collection, Use and Disclosure of Student Information](#).

#### **5. Storage and Retention of Records**

- (a) The University maintains student records in hard copy and electronic form.

- (b) Electronic records contain all the 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 enrolment reports and statistical information required by government agencies. All portions of a student's electronic record, which are needed to produce official transcripts, are maintained indefinitely. As such a record is retained on a permanent basis; it must be reviewed periodically, especially at times of upgrade or migration to a new system. Moreover, metadata<sup>3</sup> pertaining to the system itself should be maintained, in hard copy form, in the Archives.
- (c) Physical records are retained or disposed of according to the University's Student and Applicant Records' Retention and Disposition Schedules.<sup>4</sup>

## 6. Access to Records and Disclosure of Information

### 6.1 Public Access

Personal information (as defined in Section 2 of the "Act") contained in the student record is disclosed only under circumstances summarized in Sections 42 and 21 of the [Freedom of Information and Protection of Privacy Act](#) (the "Act").

The University will disclose a minimum of information about students who have graduated, which is considered to be public information, as follows:

- (a) degrees obtained and dates conferred, and in most circumstances,
- (b) scholarships and the dates awarded.

Whether a student is currently registered is not considered to be public information, and may not be disclosed except in accordance with Section 42 of the "Act".

Students may request additional privacy for reasons of personal security, for example, if they are being, or are in fear of being, threatened or harassed. All such requests should be directed to the Associate University Registrar, Student Records and Services, and may be supported by the student's academic dean or the Dean of Student Affairs. Students' electronic records on the PS Student Information will be marked so that it is obvious that privacy has been requested and in a manner that limits even authorized use. In those instances where a faculty or staff member needs to know the concealed name to perform official duties, he/she may contact the Associate University Registrar, Student Records and Services. The minimum of public information disclosed, as described above, will not be released for those students who have their records marked as required privacy.

Students with an "additional privacy" flag will continue to be included in class or group Listserv e-

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<sup>3</sup> Metadata, or "data on data", includes a system overview, program documentation, record layouts, code books, and any other record that will ensure proper access to, and retrieval of, electronic information.

<sup>4</sup> <http://archives.queensu.ca/records-retention-schedules>

mail distribution lists. However, their names and e-mail addresses will be concealed from the authorized user.

In accordance with the "Act", the student number is considered confidential personal information, the disclosure of which constitutes an unjustified invasion of personal privacy. Student numbers and PINs<sup>5</sup>, for example, should not normally be released over the telephone to students<sup>6</sup> unless written authorization to do so is provided. For the purposes of communication and expediency in classes, a four-digit identifier may be used in place of the confidential student number. This can be achieved by dropping the first two digits and the last digit from the student number; in most cases, this should provide a unique identifier. Grades and evaluative comments are also confidential, and instructors should develop a process for returning graded material that does not jeopardize this confidentiality.

## 6.2 Student Access

- (a) Students normally have the right to inspect documents contained in their own record; however, the University may refuse to disclose personal information pursuant to Section 49 of the [Freedom of Information and Protection of Privacy Act](#) (the "Act"), which includes an exemption for "evaluative or opinion material" such as confidential evaluations and letters of reference supplied to the University.
- (b) Students have the right to request that erroneous information contained in their record be corrected, and that recipients of any incorrect information be advised of the correction. According to Section 47(2)(b) of the "Act", a student may "require that a statement of disagreement be attached to the information reflecting any correction that was requested but not made".
- (c) Registered students have direct access to their electronic record via SOLUS (Student OnLine University System), which contains biographic, academic and financial information. Students wishing to inspect their physical record should make an appointment with an authorized official of the Faculty or School where the record is kept. Student numbers and PINs will not normally be released over the telephone to students, unless written authorization to do so is provided.
- (d) Upon formal request to the Office of the University Registrar and payment of a fee, students whose fee account shows no outstanding balance may obtain an official transcript of their record of studies at the University or have copies thereof sent to a third party. Official transcripts will be complete and unabridged. (Transcripts show the scholarships granted, programs of study followed, courses taken, results obtained, and degrees awarded. They may also contain the student's overall standing, promotion comments, disciplinary rulings, and information on awards of distinction.)
- (e) Students will not be allowed access to official documents from other institutions, nor will official

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<sup>5</sup> A "PIN", or Personal Identification Number, is assigned to all students at the time of their first pre-registration, and, in conjunction with their student number, is required for students to access QCARD (Queen's computerized Academic and Registration Database).

<sup>6</sup> In other words, students should "self-identify" their own student number.

documents from other universities be released or redirected.

(f) Students only may have access to information about their academic records or financial accounts with the University (i.e., no academic or financial information will be released to a third party, including parents and guardians, without the student's written authorization), or unless the University is compelled to do so by law.

(g) Students with a debt to the University may be sanctioned<sup>7</sup> under Senate policy and denied access to personal information such as marks, official transcripts, and diplomas, until such time as the debt is completely discharged.

### 6.3 Faculty and Staff Access

Faculty and staff members of the University are given access to information contained in student records if they NEED TO KNOW the information in order to perform their official duties. As a general rule, only employees involved in some aspect of academic administration or student affairs are given access to the contents of student records (see the "Act", Section 42(d)). For example, individual instructors are not normally entitled to see any part of a student's record not directly related to her/his specific course, including past academic performance and letters of reference.

For further details about how personal information is accessed and disclosed, see the [Notice of Collection, Use and Disclosure of Student Information](#).

## 7. Period of Review

This Student and Applicant Record Policy will stand effective as of September 1, 1998. The OUR will annually review the information contained herein, with particular consideration of its continued accuracy and implementation.

Feedback concerning this document may be directed to the Office of the University Registrar, Attention: Student and Applicant Record Policy, or via e-mail at [ourweb@queensu.ca](mailto:ourweb@queensu.ca).

## 8. Summary

The philosophy of the Office of the University Registrar, acting as the primary custodian of student information, is to provide appropriate access to information while protecting the confidentiality of student and applicant records. For circumstances where this document is silent, or where there may be a discrepancy or a dispute, the [Freedom of Information and Protection of Privacy Act](#), will always apply.

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<sup>7</sup> Sanctioned Debt: "Any student with an overdue debt with the University will not be permitted to register or to receive examination results, official transcripts, or marks reports until the outstanding account is settled in full or until an acceptable arrangement for settling the account is made by the department(s) concerned. In no case will a diploma be released to a student with an outstanding debt to the University."