

POLICY:  <b>Student Privacy and Access to Information Policy</b>		POLICY NUMBER:  <b>AM-012-A1</b>
		PREVIOUS/REPLACES:  <b>Updated January 25, 2022</b>
APPROVED BY:  <b>Executive Committee</b>	EFFECTIVE DATE AS OF:  <b>February 1, 2022</b>	PRIOR VERSIONS:  <b>November 1, 2021</b>

## 1. Policy Statement

Herzing College is committed to protecting the privacy of students' personal information. The College collects, uses, and discloses students' personal information in accordance with the Freedom of Information and Personal Privacy Act, R.S.O. 1990, c. F.31 (FIPPA). The policy defines procedures pertaining to the educational records retained by the College, the student's right to access records and the process to request corrections if necessary, and the protection of privacy regarding release of information to third parties. Student personal information collected by the College contains identifying information, including, but not limited to, name, address, date of birth, and financial information.

## 2. Scope

This policy applies to all Herzing College staff, faculty members, and students unless otherwise noted.

## 3. Policy Content

1. There are physical and digital files maintained by the College regarding the student. Physical student files are maintained at the campus. Digital files are located on servers using software provided by a third party which specializes in providing this service to post-secondary institutions. A student may request to access their physical file at any time by sending such request to the Academic Dean or the Director of Educational Funding. Key student information, particularly grades, can be accessed by the student online wherever the student has access to the Internet.
2. The only information that Herzing College considers to be available to others is as follows: name, major field of study, dates of attendance, full-time/part-time status, and diploma or degree awarded. The release of any information requires the written permission of the student.
3. The administrative office on each campus will, upon request, provide stakeholders with a statement showing which records are maintained, where to find them, how to ask for a correction, who has access to the records and how information is released to others.
4. Access to physical and digital student records is only available to college personnel with a need to know. Physical records are kept in locked rooms and/or cabinets. Digital records are only accessible to college personnel with the correct access credentials. The third-party providing access and maintenance of the

student digital records employs state of the art data security through data backups and cybersecurity protocols.

5. Physical files except for student academic transcripts are kept for seven years and then securely destroyed. Academic transcripts are kept for 50 years either in physical or digital form.
6. Herzing College collects the personal information of students as part of the services provided. Personal information collected by the College includes certain identifying information, including, but not limited to, names, addresses, dates of birth and certain financial information.
7. Where required, the College obtains the consent of individuals before or when it collects, uses, or discloses personal information. The College may collect, use, or disclose personal information without the knowledge or consent of individuals but only as specified and permitted by law.
8. The College is required to disclose personal information to the Ministry of Colleges and Universities, for the collection of key performance indicators (KPI), OSAP, audits and as required by law.
9. If the College proposes to use or disclose personal information for a purpose not previously identified, the new purpose will be identified and documented prior to the new use, and where necessary, a student's consent will be obtained.
10. The College will use reasonable efforts to ensure that an individual is advised of the identified purposes for which personal information will be used or disclosed.

## 4. Student Academic Transcripts

Herzing College uses third party transcript storage provided by Career Colleges Ontario (CCO) for all graduates' transcripts. STEPS was created and operates in accordance with the Private Career Colleges Act, 2005. The development and on-going maintenance of STEPS is handled by ampEducator Inc. As a ministry-approved third-party transcript storage vendor, CCO can host a transcript storage database (STEPS) and is qualified to issue and maintain career college student's transcripts.

## 5. Privacy under OSAP

Herzing College complies with the following government guidelines.

1. OSAP Privacy Breach Policy –The Privacy Breach Policy is required under OSAP designation.
2. Confidentiality Agreement from the Performance Requirements – 2019 version.

## 6. Administration

The Campus President, Academic Dean, Finance Director, or their designee, will oversee the administration and enforcement of this policy.

## 7. Review

This policy will be reviewed as required by the Executive Committee in 2024.

## 8. References

Herzing College Student Manual

Herzing College Website